Projected Change in Annual Extreme Temperature Mortality

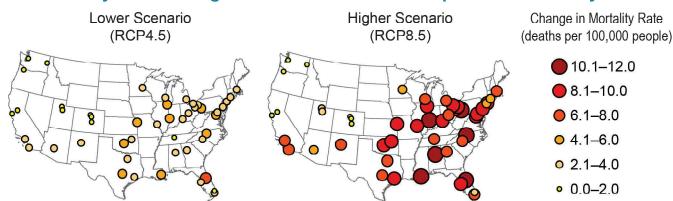


Figure 14.4: The maps show estimated changes in annual net mortality due to extremely hot and cold days in 49 U.S. cities for 2080–2099 as compared to 1989–2000. Across these cities, the change in mortality is projected to be an additional 9,300 deaths each year under a lower scenario (RCP4.5). Assuming a future in which the human health response to extreme temperatures in all 49 cities was equal to that of Dallas today (for example, as a result of availability of air conditioning or physiological adaptation) results in an approximate 50% reduction in these mortality estimates. For example, in Atlanta, an additional 349 people are projected to die from extreme temperatures each year by the end of century under RCP8.5. Assuming residents of Atlanta in 2090 have the adaptive capacity of Dallas residents today, this number is reduced to 128 additional deaths per year. Cities without circles should not be interpreted as having no extreme temperature impact. Data not available for the U.S. Caribbean, Alaska, or Hawai'i & U.S.-Affiliated Pacific Islands regions. Source: adapted from EPA 2017.¹⁵⁷

scenario, more than half of these deaths could be avoided each year. Annual damages associated with the additional extreme temperature-related deaths in 2090 were projected to be \$140 billion (in 2015 dollars) under a higher scenario (RCP8.5) and \$60 billion under a lower scenario (RCP4.5). ¹⁵⁷

Labor Productivity

Under a higher scenario (RCP8.5), almost two billion labor hours are projected to be lost annually by 2090 from the impacts of temperature extremes, costing an estimated \$160 billion in lost wages (in 2015 dollars) (Ch. 1: Overview, Figure 1.21). 157,167,169 States within the Southeast and Southern Great Plains regions are projected to experience higher impacts, with labor productivity in jobs with greater exposure to heat projected to decline by 3% (Ch. 19: Southeast). 164,170 Some counties in Texas and Florida are projected to experience more than 6% losses in annual labor hours by the end of the century. 157,160

Infectious Diseases

Annual national cases of West Nile neuroinvasive disease are projected to more than double

by 2050 due to increasing temperatures, among other factors,^{30,171} resulting in approximately \$1 billion per year in hospitalization costs and premature deaths under a higher scenario (RCP8.5; in 2015 dollars).³⁷ In this same scenario, an additional 3,300 cases and \$3.3 billion in costs (in 2015 dollars) are projected each year by the end of the century. Approximately half of these cases and costs would be avoided under a lower scenario (RCP4.5).^{37,157}

Water Quality

By the end of the century, warming under a higher scenario (RCP8.5) is projected to increase the length of time recreational waters have concentrations of harmful algal blooms (cyanobacteria) above the recommended public health threshold by one month annually; these bacteria can produce a range of toxins that can cause gastrointestinal illness, neurological disorders, and other illnesses. The increase in the number of days where recreational waters pose this health risk is almost halved under a lower scenario (RCP4.5).

Acknowledgments

Technical Contributor

Stasia Widerynski

Centers for Disease Control and Prevention

USGCRP Coordinators

Ashley Bieniek-Tobasco

Health Program Coordinator

Sarah Zerbonne

Adaptation and Decision Science Coordinator

Natalie Bennett

Adaptation and Assessment Analyst

Christopher W. Avery

Senior Manager

Opening Image Credit

Algal bloom: NASA Earth Observatory image by Joshua Stevens, using Landsat data from the U.S. Geological Survey

Traceable Accounts

Process Description

The chapter evaluated the scientific evidence of the health risks of climate change, focusing primarily on the literature published since the cutoff date (approximately fall 2015) of the U.S. Climate and Health Assessment.¹ A comprehensive literature search was performed by federal contractors in December 2016 for studies published since January 1, 2014, using PubMed, Scopus, and Web of Science. An Excel file containing 2,477 peer-reviewed studies was provided to the author team for it to consider in this assessment. In addition to the literature review, the authors considered recommended studies submitted in comments by the public, the National Academies of Sciences, Engineering, and Medicine, and federal agencies. The focus of the literature was on health risks in the United States, with limited citations from other countries providing insights into risks Americans are or will likely face with climate change. A full description of the search strategy can be found at https://www.niehs.nih.gov/CCHH_Search_Strategy_NCA4_508.pdf. The chapter authors were chosen based on their expertise in the health risks of climate change. Teleconferences were held with interested researchers and practitioners in climate change and health and with authors in other chapters of this Fourth National Climate Assessment (NCA4).

Filed 01/31/24

The U.S. Climate and Health Assessment¹ did not consider adaptation or mitigation, including economic costs and benefits, so the literature cited includes research from earlier years where additional information was relevant to this assessment.

For NCA4, Air Quality was added as a report chapter. Therefore, while Key Messages in this Health chapter include consideration of threats to human health from worsened air quality, the assessment of these risks and impacts are covered in Chapter 13: Air Quality. Similarly, co-benefits of reducing greenhouse gas emissions are covered in the Air Quality chapter.

Key Message 1

Climate Change Affects the Health of All Americans

The health and well-being of Americans are already affected by climate change (very high confidence), with the adverse health consequences projected to worsen with additional climate change (likely, high confidence). Climate change affects human health by altering exposures to heat waves, floods, droughts, and other extreme events; vector-, food- and waterborne infectious diseases; changes in the quality and safety of air, food, and water; and stresses to mental health and well-being.

Description of evidence base

Multiple lines of evidence demonstrate statistically significant associations between temperature, precipitation, and other variables and adverse climate-sensitive health outcomes, indicating sensitivity to weather patterns. These lines of evidence also demonstrate that vulnerability varies across sub-populations and geographic areas; populations with higher vulnerability include poor people in high-income regions, minority groups, women, children, the disabled, those living alone, those with poor health status, Indigenous people, older adults, outdoor workers, people displaced because of weather and climate, low-income residents that lack a social network, poorly planned

communities, communities disproportionately burdened by poor environmental quality, the disenfranchised, those with less access to healthcare, and those with limited financial resources to rebound from disasters. 108,109,110,111,118,172 Recent research confirms projections that the magnitude and pattern of risks are expected to increase as climate change continues across the century. 173

Major uncertainties

The role of non-climate factors, including socioeconomic conditions, population characteristics, and human behavior, as well as health sector policies and practices, will continue to make it challenging to attribute injuries, illnesses, and deaths to climate change. Inadequate consideration of these factors creates uncertainties in projections of the magnitude and pattern of health risks over coming decades. Certainty is higher in near-term projections where there is greater understanding of future trends.

Description of confidence and likelihood

There is very high confidence that climate change is affecting the health of Americans. There is high confidence that climate-related health risks, without additional adaptation and mitigation, will likely increase with additional climate change.

Key Message 2

Exposure and Resilience Vary Across Populations and Communities

People and communities are differentially exposed to hazards and disproportionately affected by climate-related health risks (*high confidence*). Populations experiencing greater health risks include children, older adults, low-income communities, and some communities of color (*high confidence*).

Description of evidence base

Multiple lines of evidence demonstrate that low-income communities and some communities of color are experiencing higher rates of exposure to adverse environmental conditions and social conditions that can reduce their resilience to the impacts of climate change. 106,107,108,109,110 Populations with increased health and social vulnerability typically have less access to information, resources, institutions, and other factors to prepare for and avoid the health risks of climate change. 107,132,133 Across all climate-related health risks, children, older adults, low-income communities, and some communities of color are disproportionately impacted. There is high agreement among experts but fewer analyses demonstrating that other populations with increased vulnerability include outdoor workers, communities disproportionately burdened by poor environmental quality, communities in the rural southeastern United States, women, pregnant women, those experiencing gender discrimination, persons with chronic physical and mental illness, persons with various disabilities (such as those affecting mobility, long-term health, sensory perception, cognition), the homeless, those living alone, Indigenous people, people displaced because of weather and climate, low-income residents who lack a social network, poorly planned communities, the disenfranchised, those with less access to healthcare, the uninsured and underinsured,

those living in inadequate housing, and those with limited financial resources to rebound from disasters. 106,107,108,110,118

Adaptation can increase the climate resilience of populations when the process of developing and implementing policies and measures includes understanding the ethical and human rights dimensions of climate change, meeting human needs in a sustainable and equitable way, and engaging with representatives of the most impacted communities to assess the challenges they face and to define the climate solutions.^{124,125}

Major uncertainties

The role of non-climate factors, including socioeconomic conditions, discrimination (racial and ethnic, gender, persons with disabilities), psychosocial stressors, and the continued challenge to measure the cumulative effects of past, present, and future environmental exposures on certain people and communities will continue to make it challenging to attribute injuries, illnesses, and deaths to climate change. While there is no universal framework for building more resilient communities that can address the unique situations across the United States, factors integral to community resilience include the importance of social networks, the value of including community voice in the planning and execution of solutions, and the co-benefits of institutional readiness to address the physical, health, and social needs of impacted communities. These remain hard to quantify. 127,128

Description of confidence and likelihood

There is *high confidence* that climate change is disproportionately affecting the health of children, older adults, low-income communities, communities of color, tribal and Indigenous communities, and many other distinct populations. And there is *high confidence* that some of the most vulnerable populations experience greater barriers to accessing resources, information, and tools to build resilience.

Key Message 3

Adaptation Reduces Risks and Improves Health

Proactive adaptation policies and programs reduce the risks and impacts from climate-sensitive health outcomes and from disruptions in healthcare services (*medium confidence*). Additional benefits to health arise from explicitly accounting for climate change risks in infrastructure planning and urban design (*low confidence*).

Description of evidence base

Health adaptation is taking place from local to national scales. ^{129,148,174} Because most of the health risks of climate change are also current public health problems, strengthening standard health system policies and programs, such as monitoring and surveillance, are expected to be effective in the short term in addressing the additional health risks of climate change. Modifications to explicitly incorporate climate change are important to ensure effectiveness as the climate continues to change. Incorporating environmentally friendly practices into healthcare and infrastructure can promote resilience. ¹⁵¹

Major uncertainties

Overall, while there is considerable evidence of the effectiveness of public health programs, ^{110,129,130} the effectiveness of policies and programs to reduce *future* burdens of climate-sensitive health outcomes in a changing climate can only be determined over coming decades. The relatively short time period of implementing health adaptation programs means uncertainties remain about how to best incorporate climate change into existing policies and programs to manage climate-sensitive health outcomes and about which interventions will likely be most effective as the climate continues to change. ^{174,175} For example, heat wave early warning and response systems save lives, but it is not clear which components most effectively contribute to morbidity and mortality reduction.

Description of confidence and likelihood

There is *medium confidence* that with sufficient human and financial resources, adaptation policies and programs can reduce the current burden of climate-sensitive health outcomes. 110,151,176,177 There is *low confidence* that the incorporation of health risks into infrastructure and urban planning and design will likely decrease climate-sensitive health impacts.

Key Message 4

Reducing Greenhouse Gas Emissions Results in Health and Economic Benefits

Reducing greenhouse gas emissions would benefit the health of Americans in the near and long term (high confidence). By the end of this century, thousands of American lives could be saved and hundreds of billions of dollars in health-related economic benefits gained each year under a pathway of lower greenhouse gas emissions (likely, medium confidence).

Description of evidence base

Benefits of mitigation associated with air quality, including co-benefits of reducing greenhouse gas emissions, can be found in Chapter 13: Air Quality. This Key Message is consistent with and inclusive of those findings.

Multiple individual lines of evidence across several health topic areas demonstrate significant benefits of greenhouse gas emission reductions, with health impacts and health-related costs reduced by approximately half under RCP4.5 compared to RCP8.5 by the end of the century, based on comprehensive multisector quantitative analyses of economic impacts projected under consistent scenarios (Ch. 13: Air Quality). 37,157,158,159,160,161,162,163,164,165,166,167 The economic benefits of greenhouse gas emissions reductions to the health sector could be on the order of hundreds of billions of dollars annually by the end of the century.

Heat: Greenhouse gas emission reductions under RCP4.5 could substantially reduce the annual number of heat wave days (for example, by 21 in the Northwest and by 43 in the Southeast by the end of the century);¹⁶¹ the number of high-mortality heat waves;^{162,168} and heat wave intensities.^{161,168} The EPA (2017)¹⁵⁷ estimated city-specific relationships between daily deaths (from all causes) and extreme temperatures based on historical observations that were combined with the projections of extremely hot and cold days (average of three years centered on 2050 and 2090) using city-specific extreme temperature thresholds to project future deaths from extreme heat and cold

under RCP8.5 and RCP4.5 in five global climate models (GCMs). In 49 large U.S. cities, changes in extreme temperatures are projected to result in over 9,000 premature deaths per year under RCP8.5 by the end of the century without adaptation (\$140 billion each year); under RCP4.5, more than half these deaths could be avoided annually (\$60 billion each year). ¹⁵⁷

Labor productivity: Hsiang et al. (2017)¹⁶⁷ and the EPA (2017)¹⁵⁷ estimated the number of labor hours from changes in extreme temperatures using dose–response functions for the relationship between temperature and labor from Graff Zivin and Neidell (2014).¹⁶⁹ Under RCP8.5, almost 2 billion labor hours are projected to be lost annually by 2090 from the impacts of extreme heat and cold, costing an estimated \$160 billion in lost wages. The Southeast^{164,170} and Southern Plains are projected to experience high impacts, with labor productivity in high–risk sectors projected to decline by 3%. Some counties in Texas and Florida are projected to experience more than 6% losses in annual labor hours by the end of the century.^{157,160}

Vector-borne disease: Belova et al. (2017)³⁷ and the EPA (2017)¹⁵⁷ define health impact functions from regional associations between temperatures and the probability of above-average West Nile neuroinvasive disease (WNND) incidence to estimate county-level expected WNND incidence rates for a 1995 reference period (1986–2005) and two future years (2050: 2040–2059 and 2090: 2080–2099) using temperature data from five GCMs. Annual national cases of WNND are projected to more than double by 2050 due to increasing temperatures, resulting in approximately \$1 billion per year in hospitalization costs and premature deaths. In 2090, an additional 3,300 annual cases are projected under RCP8.5, with \$3.3 billion per year in costs. Greenhouse gas emission reductions under RCP4.5 could avoid approximately half these cases and costs.

Water quality: Chapra et al. (2017)¹⁶⁵ and the EPA (2017)¹⁵⁷ evaluate the biophysical impacts of climate change on the occurrence of cyanobacterial harmful algal blooms in the contiguous United States using models that project rainfall runoff, water demand, water resources systems, water quality, and algal growth. In 2090, warming under RCP8.5 is projected to increase the length of time that recreational waters have concentrations of harmful algal blooms (cyanobacteria) above the recommended public health threshold by one month annually; greenhouse gas emissions under RCP4.5 could reduce this by two weeks.

Food safety and nutrition: There is limited evidence quantifying specific health outcomes or economic impacts of reduced food safety and nutrition.

Major uncertainties

While projections consistently indicate that changes in climate are expected to have negative health consequences, quantifying specific health outcomes (for example, number of cases, number of premature deaths) remains challenging, as noted in Key Message 1. Economic estimates only partially capture and monetize impacts across each health topic area, which means that damage costs are likely to be an undervaluation of the actual health impacts that would occur under any given scenario. Economic estimates in this chapter do not include costs to the healthcare system.

Description of confidence and likelihood

There is a *high confidence* that a reduction in greenhouse gas emissions would benefit the health of Americans. There is *medium confidence* that reduced greenhouse gas emissions under RCP4.5

compared to RCP8.5 will *likely* reduce lost labor hours by almost half and avoid thousands of premature deaths and illnesses projected each year from climate impacts on extreme heat, ozone and aeroallergen levels (Ch. 13: Air Quality), and West Nile neuroinvasive disease. There is *medium* confidence that the economic benefits of greenhouse gas emissions reductions in the health sector could *likely* be on the order of hundreds of billions of dollars each year by the end of the century. Including avoided or reduced benefits of risks that are difficult to quantify, such as mental health or long-term health consequences, would increase these estimates.

References

- USGCRP, 2016: The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 312 pp. http://dx.doi.org/10.7930/J0R49NQX
- 2. Balbus, J., A. Crimmins, J.L. Gamble, D.R. Easterling, K.E. Kunkel, S. Saha, and M.C. Sarofim, 2016: Ch. 1: Introduction: Climate change and human health. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 25–42. http://dx.doi.org/10.7930/J0VX0DFW
- 3. Bell, J.E., S.C. Herring, L. Jantarasami, C. Adrianopoli, K. Benedict, K. Conlon, V. Escobar, J. Hess, J. Luvall, C.P. Garcia-Pando, D. Quattrochi, J. Runkle, and C.J. Schreck, III, 2016: Ch. 4: Impacts of extreme events on human health. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 99–128. http://dx.doi.org/10.7930/J0BZ63ZV
- Dodgen, D., D. Donato, N. Kelly, A. La Greca, J. Morganstein, J. Reser, J. Ruzek, S. Schweitzer, M.M. Shimamoto, K. Thigpen Tart, and R. Ursano, 2016: Ch. 8: Mental health and well-being. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 217–246. http://dx.doi.org/10.7930/J0TX3C9H
- Mills, D., R. Jones, C. Wobus, J. Ekstrom, L. Jantarasami, A. St. Juliana, and A. Crimmins, 2018: Projecting agestratified risk of exposure to inland flooding and wildfire smoke in the United States under two climate scenarios. Environmental Health Perspectives, 126 (4), 047007. http://dx.doi.org/10.1289/EHP2594
- Bathi, J.R. and H.S. Das, 2016: Vulnerability of coastal communities from storm surge and flood disasters. International Journal of Environmental Research and Public Health, 13 (2), 239. http://dx.doi.org/10.3390/ijerph13020239
- Gotanda, H., J. Fogel, G. Husk, J.M. Levine, M. Peterson, K. Baumlin, and J. Habboushe, 2015: Hurricane Sandy: Impact on emergency department and hospital utilization by older adults in Lower Manhattan, New York (USA). Prehospital and Disaster Medicine, 30 (5), 496-502. http://dx.doi.org/10.1017/S1049023X15005087

- 8. Greenstein, J., J. Chacko, B. Ardolic, and N. Berwald, 2016: Impact of Hurricane Sandy on the Staten Island University Hospital Emergency Department. Prehospital and Disaster Medicine, **31** (3), 335-339. http://dx.doi.org/10.1017/S1049023X16000261
- 9. Shultz, J.M., J.P. Kossin, J.M. Shepherd, J.M. Ransdell, R. Walshe, I. Kelman, and S. Galea, 2018: Risks, health consequences, and response challenges for small-island-based populations: Observations from the 2017 Atlantic hurricane season. Disaster Medicine and Public Health Preparedness, 1-13. http://dx.doi.org/10.1017/dmp.2018.28
- Barreau, T., D. Conway, K. Haught, R. Jackson, R. Kreutzer, A. Lockman, S. Minnick, R. Roisman, D. Rozell, S. Smorodinsky, D. Tafoya, and J.A. Wilken, 2017: Physical, mental, and financial impacts from drought in two California counties, 2015. American Journal of Public Health, 107 (5), 783-790. http://dx.doi.org/10.2105/ajph.2017.303695
- 11. Griffin, D. and K.J. Anchukaitis, 2014: How unusual is the 2012–2014 California drought? Geophysical Research Letters, **41** (24), 9017–9023. http://dx.doi.org/10.1002/2014GL062433
- 12. Gorris, M.E., L.A. Cat, C.S. Zender, K.K. Treseder, and J.T. Randerson, 2018: Coccidioidomycosis dynamics in relation to climate in the southwestern United States. GeoHealth, 2 (1), 6-24. http://dx.doi.org/10.1002/2017GH000095
- Coopersmith, E.J., J.E. Bell, K. Benedict, J. Shriber, O. McCotter, and M.H. Cosh, 2017: Relating coccidioidomycosis (valley fever) incidence to soil moisture conditions. GeoHealth, 1 (1), 51-63. http://dx.doi.org/10.1002/2016GH000033
- 14. Berman, J.D., K. Ebisu, R.D. Peng, F. Dominici, and M.L. Bell, 2017: Drought and the risk of hospital admissions and mortality in older adults in western USA from 2000 to 2013: A retrospective study. The Lancet Planetary Health, 1 (1), e17-e25. http://dx.doi.org/10.1016/S2542-5196(17)30002-5
- 15. Friel, S., H. Berry, H. Dinh, L. O'Brien, and H.L. Walls, 2014: The impact of drought on the association between food security and mental health in a nationally representative Australian sample. BMC Public Health, 14 (1), 1102. http://dx.doi.org/10.1186/1471-2458-14-1102

560

Vins, H., J. Bell, S. Saha, and J. Hess, 2015: The mental health outcomes of drought: A systematic review and causal process diagram. International Journal of Environmental Research and Public Health, 12 (10), 13251. http://dx.doi.org/10.3390/ijerph121013251

Case 5:23-cv-00304-H

- Yusa, A., P. Berry, J.J. Cheng, N. Ogden, B. Bonsal, R. Stewart, and R. Waldick, 2015: Climate change, drought and human health in Canada. International Journal of Environmental Research and Public Health, 12 (7), 8359. http://dx.doi.org/10.3390/ ijerph120708359
- 18. Sarofim, M.C., S. Saha, M.D. Hawkins, D.M. Mills, J. Hess, R. Horton, P. Kinney, J. Schwartz, and A. St. Juliana, 2016: Ch. 2: Temperature-related death and illness. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 43-68. http://dx.doi.org/10.7930/J0MG7MDX
- Levy, B.S. and J.A. Patz, 2015: Climate change, human rights, and social justice. Annals of Global Health, 81 (3), 310-322. https://www.sciencedirect.com/ science/article/pii/S2214999615012242
- 20. Choudhary, E. and A. Vaidyanathan, 2014: Heat stress illness hospitalizations—Environmental public health tracking program, 20 States, 2001-2010. MMWR Surveillance Summaries, 63 (13), 1-10. https://www. cdc.gov/mmwr/preview/mmwrhtml/ss6313a1.htm
- 21. Wang, Y., J.F. Bobb, B. Papi, Y. Wang, A. Kosheleva, Q. Di, J.D. Schwartz, and F. Dominici, 2016: Heat stroke admissions during heat waves in 1,916 US counties for the period from 1999 to 2010 and their effect modifiers. Environmental Health, 15 (1), 83. http:// dx.doi.org/10.1186/s12940-016-0167-3
- 22. Gronlund, C.J., A. Zanobetti, G.A. Wellenius, J.D. Schwartz, and M.S. O'Neill, 2016: Vulnerability to renal, heat and respiratory hospitalizations during extreme heat among U.S. elderly. Climatic Change, 136 (3), 631-645. http://dx.doi.org/10.1007/ s10584-016-1638-9
- 23. Bobb, J.F., Z. Obermeyer, Y. Wang, and F. Dominici, 2014: Cause-specific risk of hospital admission related to extreme heat in older adults. JAMA, 312 (24), 2659-2667. http://dx.doi.org/10.1001/jama.2014.15715

- 24. Ross, M.E., A.M. Vicedo-Cabrera, R.E. Kopp, L. Song, D.S. Goldfarb, J. Pulido, S. Warner, S.L. Furth, and G.E. Tasian, 2018: Assessment of the combination of temperature and relative humidity on kidney stone presentations. Environmental Research, 162, 97-105. http://dx.doi.org/10.1016/j.envres.2017.12.020
- Ngo, N.S. and R.M. Horton, 2016: Climate change and fetal health: The impacts of exposure to extreme temperatures in New York City. Environmental Research, 144, 158-164. http://dx.doi.org/10.1016/j. envres.2015.11.016
- 26. Ha, S., D. Liu, Y. Zhu, S.S. Kim, S. Sherman, and P. Mendola, 2017: Ambient temperature and early delivery of singleton pregnancies. Environmental Health Perspectives, 125, 453-459. http://dx.doi. org/10.1289/EHP97
- Saha, S., J.W. Brock, A. Vaidyanathan, D.R. Easterling, and G. Luber, 2015: Spatial variation in hyperthermia emergency department visits among those with employer-based insurance in the United States - a case-crossover analysis. Environmental Health, 14 (1), 20. http://dx.doi.org/10.1186/s12940-015-0005-z
- Petitti, D.B., D.M. Hondula, S. Yang, S.L. Harlan, and G. Chowell, 2016: Multiple trigger points for quantifying heat-health impacts: New evidence from a hot climate. Environmental Health Perspectives, 124, 176-183. http://dx.doi.org/10.1289/ehp.1409119
- Sheridan, S.C. and S. Lin, 2014: Assessing variability in the impacts of heat on health outcomes in New York City over time, season, and heat-wave duration. EcoHealth, 11 (4), 512-525. http://dx.doi.org/10.1007/ s10393-014-0970-7
- 30. Beard, C.B., R.J. Eisen, C.M. Barker, J.F. Garofalo, M. Hahn, M. Hayden, A.J. Monaghan, N.H. Ogden, and P.J. Schramm, 2016: Ch. 5: Vector-borne Diseases. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 129-156. http://dx.doi.org/10.7930/J0765C7V
- Monaghan, A.J., K.M. Sampson, D.F. Steinhoff, K.C. Ernst, K.L. Ebi, B. Jones, and M.H. Hayden, 2016: The potential impacts of 21st century climatic and population changes on human exposure to the virus vector mosquito Aedes aegypti. Climatic Change. http://dx.doi.org/10.1007/s10584-016-1679-0

- 32. Butterworth, M.K., C.W. Morin, and A.C. Comrie, 2017: An analysis of the potential impact of climate change on dengue transmission in the southeastern United States. *Environmental Health Perspectives*, **125**, 579–585. http://dx.doi.org/10.1289/EHP218
- Linthicum, K.J., A. Anyamba, S.C. Britch, J.L. Small, and C.J. Tucker, 2016: Climate teleconnections, weather extremes, and vector-borne disease outbreaks. Global Health Impacts of Vector-Borne Diseases: Workshop Summary. Mack, A., Ed. National Academies Press, Washington, DC, 202-220. http://dx.doi.org/10.17226/21792
- 34. Vazquez-Prokopec, G.M., T.A. Perkins, L.A. Waller, A.L. Lloyd, R.C. Reiner, Jr., T.W. Scott, and U. Kitron, 2016: Coupled heterogeneities and their impact on parasite transmission and control. *Trends in Parasitology*, **32** (5), 356-367. http://dx.doi.org/10.1016/j.pt.2016.01.001
- 35. Chretien, J.-P., A. Anyamba, J. Small, S. Britch, J.L. Sanchez, A.C. Halbach, C. Tucker, and K.J. Linthicum, 2015: Global climate anomalies and potential infectious disease risks: 2014-2015. PLOS *Currents Outbreaks*, 2015, Edition 1. http://dx.doi.org/10.1371/currents.outbreaks.95fbc4a8fb4695e049baabfc2fc8289f
- 36. Fisman, D.N., A.R. Tuite, and K.A. Brown, 2016: Impact of El Niño Southern Oscillation on infectious disease hospitalization risk in the United States. *Proceedings of the National Academy of Sciences of the United States of America*, **113** (51), 14589-14594. http://dx.doi.org/10.1073/pnas.1604980113
- Belova, A., D. Mills, R. Hall, A.S. Juliana, A. Crimmins, C. Barker, and R. Jones, 2017: Impacts of increasing temperature on the future incidence of West Nile neuroinvasive disease in the United States. American Journal of Climate Change, 6 (1), 75278. http://dx.doi.org/10.4236/ajcc.2017.61010
- Ogden, N.H. and L.R. Lindsay, 2016: Effects of climate and climate change on vectors and vector-borne diseases: Ticks are different. Trends in Parasitology, 32 (8), 646-656. http://dx.doi.org/10.1016/j.pt.2016.04.015
- Ryan, S.J., A. McNally, L.R. Johnson, E.A. Mordecai, T. Ben-Horin, K. Paaijmans, and K.D. Lafferty, 2015: Mapping physiological suitability limits for malaria in Africa under climate change. Vector-Borne and Zoonotic Diseases, 15 (12), 718-725. http://dx.doi.org/10.1089/vbz.2015.1822

- 40. Mordecai, E.A., J.M. Cohen, M.V. Evans, P. Gudapati, L.R. Johnson, C.A. Lippi, K. Miazgowicz, C.C. Murdock, J.R. Rohr, S.J. Ryan, V. Savage, M.S. Shocket, A. Stewart Ibarra, M.B. Thomas, and D.P. Weikel, 2017: Detecting the impact of temperature on transmission of Zika, dengue, and chikungunya using mechanistic models. PLOS Neglected Tropical Diseases, 11 (4), e0005568. http://dx.doi.org/10.1371/journal.pntd.0005568
- 41. Vazquez-Prokopec, G.M., A. Lenhart, and P. Manrique-Saide, 2016: Housing improvement: A novel paradigm for urban vector-borne disease control? *Transactions of The Royal Society of Tropical Medicine and Hygiene*, **110** (10), 567-569. http://dx.doi.org/10.1093/trstmh/trw070
- 42. Springer, Y.P., C.S. Jarnevich, D.T. Barnett, A.J. Monaghan, and R.J. Eisen, 2015: Modeling the present and future geographic distribution of the Lone Startick, Amblyomma americanum (Ixodida: Ixodidae), in the continental United States. The American Journal of Tropical Medicine and Hygiene, 93 (4), 875-890. http://dx.doi.org/10.4269/ajtmh.15-0330
- 43. Hahn, M.B., C.S. Jarnevich, A.J. Monaghan, and R.J. Eisen, 2016: Modeling the geographic distribution of Ixodes scapularis and Ixodes pacificus (Acari: Ixodidae) in the contiguous United States. Journal of Medical Entomology, 53 (5), 1176-1191. http://dx.doi.org/10.1093/jme/tjw076
- 44. Becker, E., 2016: June 2016 ENSO Discussion: The New Neutral. National Oceanic and Atmospheric Administration, Climate.gov, Silver Spring, MD. https://www.climate.gov/news-features/blogs/enso/june-enso-discussion-new-neutral
- 45. Muñoz, Á.G., M.C. Thomson, A.M. Stewart-Ibarra, G.A. Vecchi, X. Chourio, P. Nájera, Z. Moran, and X. Yang, 2017: Could the recent Zika epidemic have been predicted? Frontiers in Microbiology, **8** (1291). http://dx.doi.org/10.3389/fmicb.2017.01291
- 46. Bogoch, I.I., O.J. Brady, M.U.G. Kraemer, M. German, M.I. Creatore, M.A. Kulkarni, J.S. Brownstein, S.R. Mekaru, S.I. Hay, E. Groot, A. Watts, and K. Khan, 2016: Anticipating the international spread of Zika virus from Brazil. The Lancet, **387** (10016), 335-336. http://dx.doi.org/10.1016/S0140-6736(16)00080-5

- 47. Caminade, C., J. Turner, S. Metelmann, J.C. Hesson, M.S.C. Blagrove, T. Solomon, A.P. Morse, and M. Baylis, 2017: Global risk model for vector-borne transmission of Zika virus reveals the role of El Niño 2015. Proceedings of the National Academy of Sciences of the United States of America, 114 (1), 119-124. http://dx.doi.org/10.1073/pnas.1614303114
- Carlson, C.J., E.R. Dougherty, and W. Getz, 2016: An ecological assessment of the pandemic threat of Zika virus. PLOS Neglected Tropical Diseases, 10 (8), e0004968. https://journals.plos.org/plosntds/article?id=10.1371/journal.pntd.0004968
- 49. Trtanj, J., L. Jantarasami, J. Brunkard, T. Collier, J. Jacobs, E. Lipp, S. McLellan, S. Moore, H. Paerl, J. Ravenscroft, M. Sengco, and J. Thurston, 2016: Ch. 6: Climate impacts on water-related illness. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 157–188. http://dx.doi.org/10.7930/J03F4MH4
- Jacobs, J., S.K. Moore, K.E. Kunkel, and L. Sun, 2015: A framework for examining climate-driven changes to the seasonality and geographical range of coastal pathogens and harmful algae. Climate Risk Management, 8, 16-27. http://dx.doi.org/10.1016/j.crm.2015.03.002
- 51. Davidson, K., R.J. Gowen, P.J. Harrison, L.E. Fleming, P. Hoagland, and G. Moschonas, 2014: Anthropogenic nutrients and harmful algae in coastal waters. *Journal of Environmental Management*, **146**, 206-216. http://dx.doi.org/10.1016/j.jenvman.2014.07.002
- 52. Glibert, P.M., J. Icarus Allen, Y. Artioli, A. Beusen, L. Bouwman, J. Harle, R. Holmes, and J. Holt, 2014: Vulnerability of coastal ecosystems to changes in harmful algal bloom distribution in response to climate change: Projections based on model analysis. Global Change Biology, 20 (12), 3845–3858. http://dx.doi.org/10.1111/gcb.12662
- 53. Paerl, H.W., 2014: Mitigating harmful cyanobacterial blooms in a human- and climatically-impacted world. Life, **4** (4), 988-1012. http://dx.doi.org/10.3390/life4040988
- 54. Pacyna, J.M., I.T. Cousins, C. Halsall, A. Rautio, J. Pawlak, E.G. Pacyna, K. Sundseth, S. Wilson, and J. Munthe, 2015: Impacts on human health in the Arctic owing to climate-induced changes in contaminant cycling—The EU ArcRisk project policy outcome. Environmental Science & Policy, 50, 200-213. http://dx.doi.org/10.1016/j.envsci.2015.02.010

- 55. Guzman Herrador, B.R., B.F. de Blasio, E. MacDonald, G. Nichols, B. Sudre, L. Vold, J.C. Semenza, and K. Nygård, 2015: Analytical studies assessing the association between extreme precipitation or temperature and drinking water-related waterborne infections: A review. Environmental Health, 14 (1), 29. http://dx.doi.org/10.1186/s12940-015-0014-y
- 56. Jagai, J.S., Q. Li, S. Wang, K.P. Messier, T.J. Wade, and E.D. Hilborn, 2015: Extreme precipitation and emergency room visits for gastrointestinal illness in areas with and without combined sewer systems: An analysis of Massachusetts data, 2003-2007. Environmental Health Perspectives, 123 (9), 873-879. http://dx.doi.org/10.1289/ehp.1408971
- 57. Aziz, R.K., M.M. Khalifa, and R.R. Sharaf, 2015: Contaminated water as a source of Helicobacter pylori infection: A review. Journal of Advanced Research, 6 (4), 539-547. http://dx.doi.org/10.1016/j.jare.2013.07.007
- 58. Galway, L.P., D.M. Allen, M.W. Parkes, and T.K. Takaro, 2014: Seasonal variation of acute gastro-intestinal illness by hydroclimatic regime and drinking water source: A retrospective population-based study. *Journal of Water and Health*, 12 (1), 122-135. http://dx.doi.org/10.2166/wh.2013.105
- 59. Tornevi, A., L. Barregård, and B. Forsberg, 2015: Precipitation and primary health care visits for gastrointestinal illness in Gothenburg, Sweden. PLOS ONE, **10** (5), e0128487. https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0128487
- Baker-Austin, C., J. Trinanes, N. Gonzalez-Escalona, and J. Martinez-Urtaza, 2017: Non-cholera vibrios: The microbial barometer of climate change. Trends in Microbiology, 25 (1), 76-84. http://dx.doi.org/10.1016/j.tim.2016.09.008
- 61. Brooks, B.W., J.M. Lazorchak, M.D.A. Howard, M.-V.V. Johnson, S.L. Morton, D.A.K. Perkins, E.D. Reavie, G.I. Scott, S.A. Smith, and J.A. Steevens, 2016: Are harmful algal blooms becoming the greatest inland water quality threat to public health and aquatic ecosystems? Environmental Toxicology and Chemistry, **35** (1), 6-13. http://dx.doi.org/10.1002/etc.3220
- 62. Carlton, E.J., A.P. Woster, P. DeWitt, R.S. Goldstein, and K. Levy, 2016: A systematic review and meta-analysis of ambient temperature and diarrhoeal diseases. *International Journal of Epidemiology*, **45** (1), 117-130. http://dx.doi.org/10.1093/ije/dyv296

- 63. Froelich, B.A. and R.T. Noble, 2016: Vibrio bacteria in raw oysters: Managing risks to human health. Philosophical Transactions of the Royal Society B: Biological Sciences, **371** (1689), 20150209. http://dx.doi.org/10.1098/rstb.2015.0209
- 64. Levy, K., A.P. Woster, R.S. Goldstein, and E.J. Carlton, 2016: Untangling the impacts of climate change on waterborne diseases: A systematic review of relationships between diarrheal diseases and temperature, rainfall, flooding, and drought. Environmental Science & Technology, **50** (10), 4905-4922. http://dx.doi.org/10.1021/acs.est.5b06186
- 65. Veenema, T.G., C.P. Thornton, R.P. Lavin, A.K. Bender, S. Seal, and A. Corley, 2017: Climate change-related water disasters' impact on population health. *Journal of Nursing Scholarship*, **49** (6), 625-634. http://dx.doi.org/10.1111/jnu.12328
- 66. Mellor, J.E., K. Levy, J. Zimmerman, M. Elliott, J. Bartram, E. Carlton, T. Clasen, R. Dillingham, J. Eisenberg, R. Guerrant, D. Lantagne, J. Mihelcic, and K. Nelson, 2016: Planning for climate change: The need for mechanistic systems-based approaches to study climate change impacts on diarrheal diseases. Science of the Total Environment, **548-549**, 82-90. http://dx.doi.org/10.1016/j.scitotenv.2015.12.087
- 67. Milazzo, A., L.C. Giles, Y. Zhang, A.P. Koehler, J.E. Hiller, and P. Bi, 2017: The effects of ambient temperature and heatwaves on daily *Campylobacter* cases in Adelaide, Australia, 1990–2012. *Epidemiology and Infection*, **145** (12), 2603–2610. http://dx.doi.org/10.1017/S095026881700139X
- Canyon, D.V., R. Speare, and F.M. Burkle, 2016: Forecasted impact of climate change on infectious disease and health security in Hawaii by 2050. Disaster Medicine and Public Health Preparedness, 10 (6), 797-804. http://dx.doi.org/10.1017/dmp.2016.73
- 69. Muhling, B.A., C.F. Gaitán, C.A. Stock, V.S. Saba, D. Tommasi, and K.W. Dixon, 2017: Potential salinity and temperature futures for the Chesapeake Bay using a statistical downscaling spatial disaggregation framework. Estuaries and Coasts. http://dx.doi.org/10.1007/s12237-017-0280-8
- Leight, A.K., R. Hood, R. Wood, and K. Brohawn, 2016: Climate relationships to fecal bacterial densities in Maryland shellfish harvest waters. Water Research, 89, 270-281. http://dx.doi.org/10.1016/j.watres.2015.11.055

- 71. Semenza, J.C., J. Trinanes, W. Lohr, B. Sudre, M. Löfdahl, J. Martinez-Urtaza, G.L. Nichols, and J. Rocklöv, 2017: Environmental suitability of Vibrio infections in a warming climate: An early warning system. *Environmental Health Perspectives*, **125** (10), 107004. http://dx.doi.org/10.1289/EHP2198
- 72. Ziska, L., A. Crimmins, A. Auclair, S. DeGrasse, J.F. Garofalo, A.S. Khan, I. Loladze, A.A. Pérez de León, A. Showler, J. Thurston, and I. Walls, 2016: Ch. 7: Food safety, nutrition, and distribution. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 189–216. http://dx.doi.org/10.7930/J0ZP4417
- 73. Hellberg, R.S. and E. Chu, 2016: Effects of climate change on the persistence and dispersal of foodborne bacterial pathogens in the outdoor environment: A review. *Critical Reviews in Microbiology*, **42** (4), 548–572. http://dx.doi.org/10.3109/1040841X.2014.972335
- 74. Lake, I.R., 2017: Food-borne disease and climate change in the United Kingdom. Environmental Health, 16 (1), 117. http://dx.doi.org/10.1186/s12940-017-0327-0
- 75. Yun, J., M. Greiner, C. Höller, U. Messelhäusser, A. Rampp, and G. Klein, 2016: Association between the ambient temperature and the occurrence of human Salmonella and Campylobacter infections. Scientific Reports, **6**, 28442. http://dx.doi.org/10.1038/srep28442
- Akil, L., H.A. Ahmad, and R.S. Reddy, 2014: Effects of climate change on Salmonella infections. Foodborne Pathogens and Disease, 11 (12), 974–980. http://dx.doi.org/10.1089/fpd.2014.1802
- Jiang, C., K.S. Shaw, C.R. Upperman, D. Blythe, C. Mitchell, R. Murtugudde, A.R. Sapkota, and A. Sapkota, 2015: Climate change, extreme events and increased risk of salmonellosis in Maryland, USA: Evidence for coastal vulnerability. Environment International, 83, 58-62. http://dx.doi.org/10.1016/j.envint.2015.06.006
- 78. Young, I., K. Gropp, A. Fazil, and B.A. Smith, 2015: Knowledge synthesis to support risk assessment of climate change impacts on food and water safety: A case study of the effects of water temperature and salinity on *Vibrio parahaemolyticus* in raw oysters and harvest waters. Food Research International, **68**, 86-93. http://dx.doi.org/10.1016/j.foodres.2014.06.035

- Soneja, S., C. Jiang, C. Romeo Upperman, R. Murtugudde, C. S. Mitchell, D. Blythe, A.R. Sapkota, and A. Sapkota, 2016: Extreme precipitation events and increased risk of campylobacteriosis in Maryland, U.S.A. Environmental Research, 149, 216-221. http:// dx.doi.org/10.1016/j.envres.2016.05.021
- 80. Medina, A., A. Rodriguez, and N. Magan, 2014: Effect of climate change on Aspergillus flavus and aflatoxin B1 production. Frontiers in Microbiology, 5 (348). http://dx.doi.org/10.3389/fmicb.2014.00348
- Battilani, P., P. Toscano, H.J. Van der Fels-Klerx, A. Moretti, M. Camardo Leggieri, C. Brera, A. Rortais, T. Goumperis, and T. Robinson, 2016: Aflatoxin B1 contamination in maize in Europe increases due to climate change. Scientific Reports, 6, 24328. http:// dx.doi.org/10.1038/srep24328
- 82. Brown, M.E., J.M. Antle, P. Backlund, E.R. Carr, W.E. Easterling, M.K. Walsh, C. Ammann, W. Attavanich, C.B. Barrett, M.F. Bellemare, V. Dancheck, C. Funk, K. Grace, J.S.I. Ingram, H. Jiang, H. Maletta, T. Mata, A. Murray, M. Ngugi, D. Ojima, B. O'Neill, and C. Tebaldi, 2015: Climate Change, Global Food Security, and the U.S. Food System. U.S. Global Change Research Program, Washington, DC, 146 pp. http://dx.doi. org/10.7930/J0862DC7
- 83. Smith, M.R., C.D. Golden, and S.S. Myers, 2017: Potential rise in iron deficiency due to future anthropogenic carbon dioxide emissions. GeoHealth, 1 (6), 248-257. http://dx.doi.org/10.1002/2016GH000018
- 84. Myers, S.S., K.R. Wessells, I. Kloog, A. Zanobetti, and J. Schwartz, 2015: Effect of increased concentrations of atmospheric carbon dioxide on the global threat of zinc deficiency: A modelling study. The Lancet Global Health, 3 (10), e639-e645. http://dx.doi.org/10.1016/ S2214-109X(15)00093-5
- 85. Medek, D.E., J. Schwartz, and S.S. Myers, 2017: Estimated effects of future atmospheric CO2 concentrations on protein intake and the risk of protein deficiency by country and region. Environmental Health Perspectives, 125 (8), 087002. http://dx.doi.org/10.1289/EHP41
- 86. Loladze, I., 2002: Rising atmospheric CO2 and human nutrition: Toward globally imbalanced plant stoichiometry? Trends in Ecology & Evolution, 17 (10), 457-461. http://dx.doi.org/10.1016/ s0169-5347(02)02587-9

- 87. Martins, L.D., M.A. Tomaz, F.C. Lidon, F.M. DaMatta, and J.C. Ramalho, 2014: Combined effects of elevated [CO₂] and high temperature on leaf mineral balance in Coffea spp. plants. Climatic Change, 126 (3), 365-379. http://dx.doi.org/10.1007/s10584-014-1236-7
- 88. Myers, S.S., M.R. Smith, S. Guth, C.D. Golden, B. Vaitla, N.D. Mueller, A.D. Dangour, and P. Huybers, 2017: Climate change and global food systems: Potential impacts on food security and undernutrition. Annual Review of Public Health, 38 (1), 259-277. http://dx.doi. org/10.1146/annurev-publhealth-031816-044356
- 89. Bermúdez, R., Y. Feng, M.Y. Roleda, A.O. Tatters, D.A. Hutchins, T. Larsen, P.W. Boyd, C.L. Hurd, U. Riebesell, and M. Winder, 2015: Long-term conditioning to elevated pCO₂ and warming influences the fatty and amino acid composition of the diatom Cylindrotheca fusiformis. PLOS ONE, 10 (5), e0123945. http://dx.doi. org/10.1371/journal.pone.0123945
- 90. Hixson, S.M. and M.T. Arts, 2016: Climate warming is predicted to reduce omega-3, longchain, polyunsaturated fatty acid production in phytoplankton. Global Change Biology, 22 (8), 2744-2755. http://dx.doi.org/10.1111/gcb.13295
- 91. Springmann, M., D. Mason-D'Croz, S. Robinson, T. Garnett, H.C.J. Godfray, D. Gollin, M. Rayner, P. Ballon, and P. Scarborough, 2016: Global and regional health effects of future food production under climate change: A modelling study. The Lancet, **387** (10031), 1937-1946. http://dx.doi.org/10.1016/ S0140-6736(15)01156-3
- Hasegawa, T., S. Fujimori, K. Takahashi, T. Yokohata, and T. Masui, 2016: Economic implications of climate change impacts on human health through undernourishment. Climatic Change, 136 (2), 189-202. http://dx.doi.org/10.1007/s10584-016-1606-4
- 93. Ishida, H., S. Kobayashi, S. Kanae, T. Hasegawa, S. Fujimori, Y. Shin, K. Takahashi, T. Masui, A. Tanaka, and Y. Honda, 2014: Global-scale projection and its sensitivity analysis of the health burden attributable to childhood undernutrition under the latest scenario framework for climate change research. Environmental Research Letters, 9 (6), 064014. http:// dx.doi.org/10.1088/1748-9326/9/6/064014
- 94. Lloyd, S.J., R.S. Kovats, and Z. Chalabi, 2011: Climate change, crop yields, and undernutrition: Development of a model to quantify the impact of climate scenarios on child undernutrition. Environmental Health Perspectives, 119 (12), 1817-1823. http://dx.doi. org/10.1289/ehp.1003311

- 95. Lamond, J.E., R.D. Joseph, and D.G. Proverbs, 2015: An exploration of factors affecting the long term psychological impact and deterioration of mental health in flooded households. Environmental Research, 140, 325-334. http://dx.doi.org/10.1016/j. envres.2015.04.008
- 96. Milojevic, A., B. Armstrong, and P. Wilkinson, 2017: Mental health impacts of flooding: A controlled interrupted time series analysis of prescribing data in England. Journal of Epidemiology and Community Health, 71 (10), 970-973. http://dx.doi.org/10.1136/ jech-2017-208899
- 97. Munro, A., R.S. Kovats, G.J. Rubin, T.D. Waite, A. Bone, and B. Armstrong, 2017: Effect of evacuation and displacement on the association between flooding and mental health outcomes: A cross-sectional analysis of UK survey data. The Lancet Planetary Health, 1 (4), e134-e141. http://dx.doi.org/10.1016/ S2542-5196(17)30047-5
- 98. Waite, T.D., K. Chaintarli, C.R. Beck, A. Bone, R. Amlôt, S. Kovats, M. Reacher, B. Armstrong, G. Leonardi, G.J. Rubin, and I. Oliver, 2017: The English national cohort study of flooding and health: Cross-sectional analysis of mental health outcomes at year one. BMC Public Health, 17 (1), 129. http://dx.doi.org/10.1186/ s12889-016-4000-2
- 99. Ahdoot, S. and The Council on Environmental Health, 2015: Global climate change and children's health. Pediatrics, 136 (5), 992-997. http://dx.doi. org/10.1542/peds.2015-3232
- 100. Fullerton, C.S., J.B.A. McKibben, D.B. Reissman, T. Scharf, K.M. Kowalski-Trakofler, J.M. Shultz, and R.J. Ursano, 2013: Posttraumatic stress disorder, depression, and alcohol and tobacco use in public health workers after the 2004 Florida hurricanes. Disaster Medicine and Public Health Preparedness, 7 (1), 89-95. http://dx.doi.org/10.1017/dmp.2013.6
- 101. Overstreet, S., A. Salloum, and C. Badour, 2010: A school-based assessment of secondary stressors and adolescent mental health 18 months post-Katrina. Journal of School Psychology, 48 (5), 413-431. http:// dx.doi.org/10.1016/j.jsp.2010.06.002
- 102. Clayton, S., C. Manning, K. Krygsman, and M. Speiser, 2017: Mental Health and Our Changing Climate: Impacts, Implications, and Guidance. American Psychological Association and ecoAmerica, Washington, DC, 69 pp. https://www.apa.org/news/ press/releases/2017/03/mental-health-climate.pdf

- 103. Mares, D.M. and K.W. Moffett, 2016: Climate change and interpersonal violence: A "global" estimate and regional inequities. Climatic Change, 135 (2), 297-310. http://dx.doi.org/10.1007/s10584-015-1566-0
- 104. Doppelt, B., 2016: Transformational Resilience: How Building Human Resilience to Climate Disruption Can Safeguard Society and Increase Wellbeing. Greenleaf Publishing (Routledge/Taylor & Francis), New York, 368 pp.
- 105. Lowe, S.R., L. Sampson, O. Gruebner, and S. Galea, 2015: Psychological resilience after Hurricane Sandy: The influence of individual- and community-level factors on mental health after a large-scale natural disaster. PLOS ONE, 10 (5), e0125761. https://journals. plos.org/plosone/article?id=10.1371/journal. pone.0125761
- 106. Gamble, J.L., J. Balbus, M. Berger, K. Bouye, V. Campbell, K. Chief, K. Conlon, A. Crimmins, B. Flanagan, C. Gonzalez-Maddux, E. Hallisey, S. Hutchins, L. Jantarasami, S. Khoury, M. Kiefer, J. Kolling, K. Lynn, A. Manangan, M. McDonald, R. Morello-Frosch, M.H. Redsteer, P. Sheffield, K. Thigpen Tart, J. Watson, K.P. Whyte, and A.F. Wolkin, 2016: Ch. 9: Populations of concern. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. U.S. Global Change Research Program, Washington, DC, 247-286. http://dx.doi.org/10.7930/J0Q81B0T
- 107. Forman, F., G. Solomon, R. Morello-Frosch, and K. Pezzoli, 2016: Chapter 8. Bending the curve and closing the gap: Climate justice and public health. Collabra, 2 (1), 22. http://dx.doi.org/10.1525/ collabra.67
- 108. Mendez, M.A., 2015: Assessing local climate action plans for public health co-benefits in environmental justice communities. Local Environment, 20 (6), 637-663. http://dx.doi.org/10.1080/13549839. 2015.1038227
- 109. Perera, F.P., 2017: Multiple threats to child health from fossil fuel combustion: Impacts of air pollution and climate change. Environmental Health Perspectives, **125**, 141-148. http://dx.doi.org/10.1289/EHP299
- 110. Rudolph, L., S. Gould, and J. Berko, 2015: Climate Change, Health, and Equity: Opportunities For Action. Public Health Institute, Oakland, CA, 56 pp. https://bit.ly/2MJHBUp

- 111. Baussan, D., 2015: When You Can't Go Home: The Gulf Coast 10 Years after Katrina. Center for American Progress, Washington, DC, 10 pp. https://www.americanprogress.org/issues/green/reports/2015/08/18/119511/when-you-cant-go-home/
- 112. Norton-Smith, K., K. Lynn, K. Chief, K. Cozzetto, J. Donatuto, M.H. Redsteer, L.E. Kruger, J. Maldonado, C. Viles, and K.P. Whyte, 2016: Climate Change and Indigenous Peoples: A Synthesis of Current Impacts and Experiences. Gen. Tech. Rep. PNW-GTR-944. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, Portland, OR, 136 pp. https://www.fs.usda.gov/treesearch/pubs/53156
- 113. Roth, M., 2018: A resilient community is one that includes and protects everyone. Bulletin of the Atomic Scientists, **74** (2), 91-94. http://dx.doi.org/10.1080/00963402.2018.1436808
- 114. Kiefer, M., J. Rodríguez-Guzmán, J. Watson, B. van Wendel de Joode, D. Mergler, and A.S. da Silva, 2016: Worker health and safety and climate change in the Americas: Issues and research needs. Revista panamericana de salud publica = Pan American Journal of Public Health, 40 (3), 192-197. http://www.ncbi.nlm.nih.gov/pmc/articles/PMC5176103/
- 115. Vickery, J. and L.M. Hunter, 2016: Native Americans: Where in environmental justice research? Society & Natural Resources, **29** (1), 36-52. http://dx.doi.org/10.1080/08941920.2015.1045644
- 116. Gutierrez, K. and C. LePrevost, 2016: Climate justice in rural southeastern United States: A review of climate change impacts and effects on human health. *International Journal of Environmental Research and Public Health*, **13** (2), 189. http://dx.doi.org/10.3390/ijerph13020189
- 117. Sheffield, P., S. Uijttewaal, J. Stewart, and M. Galvez, 2017: Climate change and schools: Environmental hazards and resiliency. *International Journal of Environmental Research and Public Health*, **14** (11), 1397. http://dx.doi.org/10.3390/ijerph14111397
- 118. Ziegler, C., V. Morelli, and O. Fawibe, 2017: Climate change and underserved communities. *Primary Care:* Clinics in Office Practice, **44** (1), 171-184. http://dx.doi.org/10.1016/j.pop.2016.09.017
- 119. Shepard, P.M. and C. Corbin-Mark, 2009: Climate justice. Environmental Justice, **2** (4), 163-166. http://dx.doi.org/10.1089/env.2009.2402

- 120. McDonald, Y.J., S.E. Grineski, T.W. Collins, and Y.A. Kim, 2015: A scalable climate health justice assessment model. Social Science & Medicine, 133, 242–252. http://dx.doi.org/10.1016/j.socscimed.2014.10.032
- 121. Nicholas, P.K. and S. Breakey, 2017: Climate change, climate justice, and environmental health: Implications for the nursing profession. *Journal of Nursing Scholarship*, **49** (6), 606-616. http://dx.doi.org/10.1111/jnu.12326
- 122. Island Press, 2015: Bounce Forward: Urban Resilience in the Era of Climate Change. Island Press and the Kresge Foundation, Washington, DC and Troy, MI, 36 pp. https://kresge.org/sites/default/files/Bounce-Forward-Urban-Resilience-in-Era-of-Climate-Change-2015.pdf
- 123. Gonzalez, R. and Other contributors, 2017:
 Community-Driven Climate Resilience Planning:
 A Framework, Version 2.0. James, T. and J. Ross,
 Eds. National Association of Climate Resilience
 Planners, National Association of Climate Resilience
 Planners. http://movementstrategy.org/b/wp-content/uploads/2017/05/WEB-CD-CRP
 Updated-5.11.17.pdf
- 124. Schrock, G., E.M. Bassett, and J. Green, 2015: Pursuing equity and justice in a changing climate: Assessing equity in local climate and sustainability plans in U.S. cities. *Journal of Planning Education and Research*, **35** (3), 282-295. http://dx.doi.org/10.1177/0739456x15580022
- 125. White-Newsome, J.L., 2016: A policy approach toward climate justice. *The Black Scholar*, **46** (3), 12-26. http://dx.doi.org/10.1080/00064246.2016.1188353
- 126. Banks, L.H., L.A. Davenport, M.H. Hayes, M.A. McArthur, S.N. Toro, C.E. King, and H.M. Vazirani, 2016: Disaster impact on impoverished area of US: An inter-professional mixed method study. *Prehospital and Disaster Medicine*, **31** (6), 583-592. http://dx.doi.org/10.1017/S1049023X1600090X
- 127. Burger, J. and M. Gochfeld, 2017: Perceptions of severe storms, climate change, ecological structures and resiliency three years post-hurricane Sandy in New Jersey. *Urban Ecosystems*, **20** (6), 1261-1275. http://dx.doi.org/10.1007/s11252-017-0678-x
- 128. Colten, C.E., J.R.Z. Simms, A.A. Grismore, and S.A. Hemmerling, 2018: Social justice and mobility in coastal Louisiana, USA. *Regional Environmental Change*, **18** (2), 371-383. http://dx.doi.org/10.1007/s10113-017-1115-7

- 129. Anderson, H., C. Brown, L.L. Cameron, M. Christenson, K.C. Conlon, S. Dorevitch, J. Dumas, M. Eidson, A. Ferguson, E. Grossman, A. Hanson, J.J. Hess, B. Hoppe, J. Horton, M. Jagger, S. Krueger, T.W. Largo, G.M. Losurdo, S.R. Mack, C. Moran, C. Mutnansky, K. Raab, S. Saha, P.J. Schramm, A. Shipp-Hilts, S.J. Smith, M. Thelen, L. Thie, and R. Walker, 2017: Climate and Health Intervention Assessment: Evidence on Public Health Interventions to Prevent the Negative Health Effects of Climate Change. Climate and Health Technical Report Series. Centers for Disease Control and Prevention, Climate and Health Program, Atlanta, GA, 92 pp. https://www.cdc.gov/climateandhealth/docs/ $Climate And Health Intervention Assessment_508.pdf$
- 130. Aldunce, P., R. Beilin, J. Handmer, and M. Howden, 2016: Stakeholder participation in building resilience to disasters in a changing climate. Environmental Hazards, 15 (1), 58-73. http://dx.doi.org/10.1080/174 77891.2015.1134427
- 131. Ebi, K.L., J.J. Hess, and T.B. Isaksen, 2016: Using uncertain climate and development information in health adaptation planning. Current Environmental Health Reports, **3** (1), 99-105. http://dx.doi. org/10.1007/s40572-016-0077-0
- 132. Kabisch, N., H. Korn, J. Stadler, and A. Bonn, 2017: Nature-based solutions to climate change adaptation in urban areas-Linkages between science, policy and practice. Nature-Based Solutions to Climate Change Adaptation in Urban Areas: Linkages between Science, Policy and Practice. Kabisch, N., H. Korn, J. Stadler, and A. Bonn, Eds. Springer International Publishing, Cham, 1-11. http://dx.doi.org/10.1007/978-3-319-56091-5_1
- 133. Schulte, P.A., A. Bhattacharya, C.R. Butler, H.K. Chun, B. Jacklitsch, T. Jacobs, M. Kiefer, J. Lincoln, S. Pendergrass, J. Shire, J. Watson, and G.R. Wagner, 2016: Advancing the framework for considering the effects of climate change on worker safety and health. Journal of Occupational and Environmental Hygiene, 13 (11), 847-865. http://dx.doi.org/10.1080/ 15459624.2016.1179388
- 134. Lane, K., K. Wheeler, K. Charles-Guzman, M. Ahmed, M. Blum, K. Gregory, N. Graber, N. Clark, and T. Matte, 2014: Extreme heat awareness and protective behaviors in New York City. Journal of Urban Health, 91 (3), 403-414. http://dx.doi.org/10.1007/ s11524-013-9850-7

- 135. Berisha, V., D. Hondula, M. Roach, J.R. White, B. McKinney, D. Bentz, A. Mohamed, J. Uebelherr, and K. Goodin, 2017: Assessing adaptation strategies for extreme heat: A public health evaluation of cooling centers in Maricopa County, Arizona. Weather, Climate, and Society, 9 (1), 71-80. http://dx.doi. org/10.1175/wcas-d-16-0033.1
- 136. Gronlund, C.J., V.J. Berrocal, J.L. White-Newsome, K.C. Conlon, and M.S. O'Neill, 2015: Vulnerability to extreme heat by socio-demographic characteristics and area green space among the elderly in Michigan, 1990-2007. Environmental Research, 136, 449-461. http://dx.doi.org/10.1016/j.envres.2014.08.042
- 137. Klein Rosenthal, J., P.L. Kinney, and K.B. Metzger, 2014: Intra-urban vulnerability to heat-related mortality in New York City, 1997–2006. Health & Place, 30, 45-60. http://dx.doi.org/10.1016/j.healthplace.2014.07.014
- 138. Executive Office of the President, 2013: Fact Sheet: Executive Order on Climate Preparedness. The [Obama] White House, Office of the Press Secretary, Washington, DC. https://obamawhitehouse. archives.gov/the-press-office/2013/11/01/ fact-sheet-executive-order-climate-preparedness
- 139. Lowe, R., C.A. Coelho, C. Barcellos, M.S. Carvalho, R.D.C. Catão, G.E. Coelho, W.M. Ramalho, T.C. Bailey, D.B. Stephenson, and X. Rodó, 2016: Evaluating probabilistic dengue risk forecasts from a prototype early warning system for Brazil. eLIFE, 5, e11285. http://dx.doi.org/10.7554/eLife.11285
- 140. Semenza, J., 2015: Prototype early warning systems for vector-borne diseases in Europe. International Journal of Environmental Research and Public Health, 12 (6), 6333-6351. http://dx.doi.org/10.3390/ ijerph120606333
- 141. Worrall, E., S.J. Connor, and M.C. Thomson, 2008: Improving the cost-effectiveness of IRS with climate informed health surveillance systems. Malaria Journal, 7 (1), 263. http://dx.doi.org/10.1186/1475-2875-7-263
- 142. Lee, J.-S., M. Carabali, J.K. Lim, V.M. Herrera, I.-Y. Park, L. Villar, and A. Farlow, 2017: Early warning signal for dengue outbreaks and identification of high risk areas for dengue fever in Colombia using climate and non-climate datasets. BMC Infectious Diseases, 17 (1), 480. http://dx.doi.org/10.1186/s12879-017-2577-4

143. Lessler, J., L.H. Chaisson, L.M. Kucirka, Q. Bi, K. Grantz, H. Salje, A.C. Carcelen, C.T. Ott, J.S. Sheffield, N.M. Ferguson, D.A.T. Cummings, C.J.E. Metcalf, and I. Rodriguez-Barraquer, 2016: Assessing the global threat from Zika virus. Science, 353 (6300). http:// dx.doi.org/10.1126/science.aaf8160

Case 5:23-cv-00304-H

- 144. Lowe, D., K.L. Ebi, and B. Forsberg, 2011: Heatwave early warning systems and adaptation advice to reduce human health consequences of heatwaves. International Journal of Environmental Research and Public Health, 8 (12), 4623. http://dx.doi.org/10.3390/ ijerph8124623
- 145. Garfin, G.M., S. LeRoy, and H. Jones, 2017: Developing an Integrated Heat Health Information System for Long-Term Resilience to Climate and Weather Extremes in the El Paso-Juárez-Las Cruces Region. Institute of the Environment, Tucson, AZ, 63 pp. http://dx.doi.org/10.7289/V5930R6Q
- 146. Wolch, J.R., J. Byrne, and J.P. Newell, 2014: Urban green space, public health, and environmental justice: The challenge of making cities "just green enough." Landscape and Urban Planning, 125, 234-244. http:// dx.doi.org/10.1016/j.landurbplan.2014.01.017
- 147. Vogel, J., K.M. Carney, J.B. Smith, C. Herrick, M. Stults, M. O'Grady, A.S. Juliana, H. Hosterman, and L. Giangola, 2016: Climate Adaptation-The State of Practice in U.S. Communities. Kresge Foundation, http://kresge.org/sites/default/files/ library/climate-adaptation-the-state-of-practicein-us-communities-full-report.pdf
- 148. Shimamoto, M.M. and S. McCormick, 2017: The role of health in urban climate adaptation: An analysis of six U.S. cities. Weather, Climate, and Society, 9 (4), 777-785. http://dx.doi.org/10.1175/wcas-d-16-0142.1
- 149. Eckelman, M.J. and J. Sherman, 2016: Environmental impacts of the U.S. health care system and effects on public health. PLOS ONE, 11 (6), e0157014. http:// dx.doi.org/10.1371/journal.pone.0157014
- 150. Kaplan, S., B. Sadler, K. Little, C. Franz, and P. Orris, 2012: Can Sustainable Hospitals Help Bend the Health Care Cost Curve? Commonwealth Fund Pub. 1641. The Commonwealth Fund, New York, NY, 13 pp. http:// www.commonwealthfund.org/~/media/files/ publications/issue-brief/2012/nov/1641_kaplan_ can_sustainable_hosps_bend_cost_curve_ib.pdf

- 151. Guenther, R. and J. Balbus, 2014: Primary Protection: Enhancing Health Care Resilience for a Changing Climate. U.S. Department of Health and Human Services. https://toolkit.climate.gov/sites/default/ files/SCRHCFI%20Best%20Practices%20Report%20 final2%202014%20Web.pdf
- 152. National Hurricane Center, 2018: National Storm Surge Hazard Maps-Version 2. NOAA National Weather Service, Miami, FL. https://www.nhc.noaa. gov/nationalsurge/
- 153. DHS, 2018: Homeland Infrastructure Foundation-Level Data (HIFLD) [web tool]. U.S. Department of Homeland Security (DHS), Washington, DC. https:// hifld-geoplatform.opendata.arcgis.com/
- 154. Adelaine, S.A., M. Sato, Y. Jin, and H. Godwin, 2017: An assessment of climate change impacts on Los Angeles (California USA) hospitals, wildfires highest priority. Prehospital and Disaster Medicine, 32 (5), 556-562. http://dx.doi.org/10.1017/S1049023X17006586
- 155. Smith, K.R., A. Woodward, D. Campbell-Lendrum, D.D. Chadee, Y. Honda, Q. Liu, J.M. Olwoch, B. Revich, and R. Sauerborn, 2014: Human health: Impacts, adaptation, and co-benefits. Climate Change 2014: Impacts, Adaptation, and Vulnerability. Part A: Global and Sectoral Aspects. Contribution of Working Group II to the Fifth Assessment Report of the Intergovernmental Panel of Climate Change. Field, C.B., V.R. Barros, D.J. Dokken, K.J. Mach, M.D. Mastrandrea, T.E. Bilir, M. Chatterjee, K.L. Ebi, Y.O. Estrada, R.C. Genova, B. Girma, E.S. Kissel, A.N. Levy, S. MacCracken, P.R. Mastrandrea, and L.L. White, Eds. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 709-754. http:// www.ipcc.ch/report/ar5/wg2/
- 156. Knowlton, K., M. Rotkin-Ellman, L. Geballe, W. Max, and G.M. Solomon, 2011: Six climate change-related events in the United States accounted for about \$14 billion in lost lives and health costs. Health Affairs, 30 (11), 2167-2176. http://dx.doi.org/10.1377/ hlthaff.2011.0229
- 157. EPA, 2017: Multi-model Framework for Quantitative Sectoral Impacts Analysis: A Technical Report for the Fourth National Climate Assessment. EPA 430-R-17-001. U.S. Environmental Protection Agency (EPA), Washington, DC, 271 pp. https:// cfpub.epa.gov/si/si_public_record_Report. cfm?dirEntryId=335095

- 158. O'Neill, B.C., J. M. Done, A. Gettelman, P. Lawrence, F. Lehner, J.-F. Lamarque, L. Lin, A. J. Monaghan, K. Oleson, X. Ren, B. M. Sanderson, C. Tebaldi, M. Weitzel, Y. Xu, B. Anderson, M.J. Fix, and S. Levis, 2017: The Benefits of Reduced Anthropogenic Climate changE (BRACE): A synthesis. Climatic Change. http://dx.doi. org/10.1007/s10584-017-2009-x
- 159. Tebaldi, C. and M.F. Wehner, 2016: Benefits of mitigation for future heat extremes under RCP4.5 compared to RCP8.5. Climatic Change, First online, 1-13. http://dx.doi.org/10.1007/s10584-016-1605-5
- 160. Gordon, K. and the Risky Business Project, 2014: The Economic Risks of Climate Change in the United States: A Climate Risk Assessment for the United States. Risky Business Project, New York, 51pp. https:// riskybusiness.org/site/assets/uploads/2015/09/ RiskyBusiness_Report_WEB_09_08_14.pdf
- 161. Oleson, K.W., G.B. Anderson, B. Jones, S.A. McGinnis, and B. Sanderson, 2015: Avoided climate impacts of urban and rural heat and cold waves over the U.S. using large climate model ensembles for RCP8.5 and RCP4.5. Climatic Change. http://dx.doi.org/10.1007/ s10584-015-1504-1
- 162. Jones, B., C. Tebaldi, B.C. O'Neill, K. Oleson, and J. Gao, 2018: Avoiding population exposure to heatrelated extremes: Demographic change vs climate change. Climatic Change, 146 (3), 423-437. http:// dx.doi.org/10.1007/s10584-017-2133-7
- 163. Marsha, A., S.R. Sain, M.J. Heaton, A.J. Monaghan, and O.V. Wilhelmi, 2016: Influences of climatic and population changes on heat-related mortality in Houston, Texas, USA. Climatic Change. http://dx.doi. org/10.1007/s10584-016-1775-1
- 164. Houser, T., R. Kopp, S. Hsiang, M. Delgado, A. Jina, K. Larsen, M. Mastrandrea, S. Mohan, R. Muir-Wood, D. Rasmussen, J. Rising, and P. Wilson, 2014: American Climate Prospectus: Economic Risks in the United States. Rhodium Group, New York, NY, 201 pp. https://gspp.berkelev.edu/assets/uploads/ research/pdf/American_Climate_Prospectus.pdf
- 165. Chapra, S.C., B. Boehlert, C. Fant, V.J. Bierman, J. Henderson, D. Mills, D.M.L. Mas, L. Rennels, L. Jantarasami, J. Martinich, K.M. Strzepek, and H.W. Paerl, 2017: Climate change impacts on harmful algal blooms in U.S. freshwaters: A screening-level assessment. Environmental Science & Technology, 51 (16), 8933-8943. http://dx.doi.org/10.1021/acs. est.7b01498

- 166. Fann, N., C.G. Nolte, P. Dolwick, T.L. Spero, A. Curry Brown, S. Phillips, and S. Anenberg, 2015: The geographic distribution and economic value of climate change-related ozone health impacts in the United States in 2030. Journal of the Air & Waste Management Association, 65 (5), 570-580. http:// dx.doi.org/10.1080/10962247.2014.996270
- 167. Hsiang, S., R. Kopp, A. Jina, J. Rising, M. Delgado, S. Mohan, D.J. Rasmussen, R. Muir-Wood, P. Wilson, M. Oppenheimer, K. Larsen, and T. Houser, 2017: Estimating economic damage from climate change in the United States. Science, 356 (6345), 1362-1369. http://dx.doi.org/10.1126/science.aal4369
- 168. Anderson, G.B., K.W. Oleson, B. Jones, and R.D. Peng, 2016: Projected trends in high-mortality heatwaves under different scenarios of climate, population, and adaptation in 82 US communities. Climatic Change, **146** (3–4), 455–470. http://dx.doi.org/10.1007/ s10584-016-1779-x
- 169. Graff Zivin, J. and M. Neidell, 2014: Temperature and the allocation of time: Implications for climate change. Journal of Labor Economics, 32 (1), 1-26. http://dx.doi.org/10.1086/671766
- 170. Dunne, J.P., R.J. Stouffer, and J.G. John, 2013: Reductions in labour capacity from heat stress under climate warming. Nature Climate Change, 3, 563-566. http://dx.doi.org/10.1038/nclimate1827
- 171. Paull, S.H., D.E. Horton, M. Ashfaq, D. Rastogi, L.D. Kramer, N.S. Diffenbaugh, and A.M. Kilpatrick, 2017: Drought and immunity determine the intensity of West Nile virus epidemics and climate change impacts. Proceedings of the Royal Society B: Biological Sciences, 284 (1848). http://dx.doi.org/10.1098/ rspb.2016.2078
- 172. Cushing, L.J., M. Wander, R. Morello-Frosch, M. Pastor, A. Zhu, and J. Sadd, 2016: A Preliminary Environmental Equity Assessment Of California's Cap-and-Trade Program. Program for Environmental and Regional Equity (PERE) Publication. USC Dornsife, Los Angeles, CA, 17 pp. https://dornsife. usc.edu/assets/sites/242/docs/Climate_Equity_ Brief_CA_Cap_and_Trade_Sept2016_FINAL2.pdf
- 173. USGCRP, 2017: Climate Science Special Report: Fourth National Climate Assessment, Volume I. Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, 470 pp. http:// dx.doi.org/10.7930/J0J964J6

- 174. Roser-Renouf, C., E.W. Maibach, and J. Li, 2016: Adapting to the changing climate: An assessment of local health department preparations for climate change-related health threats, 2008-2012. PLOS ONE, **11** (3), e0151558. http://dx.doi.org/10.1371/journal.pone.0151558
- 175. Cheng, J.J. and P. Berry, 2013: Health co-benefits and risks of public health adaptation strategies to climate change: A review of current literature. *International Journal of Public Health*, **58** (2), 305–311. http://dx.doi.org/10.1007/s00038-012-0422-5
- 176. Clarke, K.-L. and P. Berry, 2012: From theory to practice: A Canadian case study of the utility of climate change adaptation frameworks to address health impacts. *International Journal of Public Health*, 57 (1), 167-174. http://dx.doi.org/10.1007/s00038-011-0292-2
- 177. Ebi, K.L., T.J. Teisberg, L.S. Kalkstein, L. Robinson, and R.F. Weiher, 2004: Heat watch/warning systems save lives: Estimated costs and benefits for Philadelphia 1995–98. Bulletin of the American Meteorological Society, **85** (8), 1067-1073. http://dx.doi.org/10.1175/bams-85-8-1067

Federal Register

Vol. 82, No. 39

Wednesday, March 1, 2017

Presidential Documents

Title 3—

Executive Order 13777 of February 24, 2017

The President

Enforcing the Regulatory Reform Agenda

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to lower regulatory burdens on the American people by implementing and enforcing regulatory reform, it is hereby ordered as follows:

Section 1. *Policy*. It is the policy of the United States to alleviate unnecessary regulatory burdens placed on the American people.

- **Sec. 2.** Regulatory Reform Officers. (a) Within 60 days of the date of this order, the head of each agency, except the heads of agencies receiving waivers under section 5 of this order, shall designate an agency official as its Regulatory Reform Officer (RRO). Each RRO shall oversee the implementation of regulatory reform initiatives and policies to ensure that agencies effectively carry out regulatory reforms, consistent with applicable law. These initiatives and policies include:
 - (i) Executive Order 13771 of January 30, 2017 (Reducing Regulation and Controlling Regulatory Costs), regarding offsetting the number and cost of new regulations;
 - (ii) Executive Order 12866 of September 30, 1993 (Regulatory Planning and Review), as amended, regarding regulatory planning and review;
 - (iii) section 6 of Executive Order 13563 of January 18, 2011 (Improving Regulation and Regulatory Review), regarding retrospective review; and
 - (iv) the termination, consistent with applicable law, of programs and activities that derive from or implement Executive Orders, guidance documents, policy memoranda, rule interpretations, and similar documents, or relevant portions thereof, that have been rescinded.
- (b) Each agency RRO shall periodically report to the agency head and regularly consult with agency leadership.
- **Sec. 3**. Regulatory Reform Task Forces. (a) Each agency shall establish a Regulatory Reform Task Force composed of:
 - (i) the agency RRO;
 - (ii) the agency Regulatory Policy Officer designated under section 6(a)(2) of Executive Order 12866;
 - (iii) a representative from the agency's central policy office or equivalent central office; and
 - (iv) for agencies listed in section 901(b)(1) of title 31, United States Code, at least three additional senior agency officials as determined by the agency head.
- (b) Unless otherwise designated by the agency head, the agency RRO shall chair the agency's Regulatory Reform Task Force.
- (c) Each entity staffed by officials of multiple agencies, such as the Chief Acquisition Officers Council, shall form a joint Regulatory Reform Task Force composed of at least one official described in subsection (a) of this section from each constituent agency's Regulatory Reform Task Force. Joint Regulatory Reform Task Forces shall implement this order in coordination with the Regulatory Reform Task Forces of their members' respective agencies.

- (d) Each Regulatory Reform Task Force shall evaluate existing regulations (as defined in section 4 of Executive Order 13771) and make recommendations to the agency head regarding their repeal, replacement, or modification, consistent with applicable law. At a minimum, each Regulatory Reform Task Force shall attempt to identify regulations that:
 - (i) eliminate jobs, or inhibit job creation;
 - (ii) are outdated, unnecessary, or ineffective;
 - (iii) impose costs that exceed benefits;
 - (iv) create a serious inconsistency or otherwise interfere with regulatory reform initiatives and policies;
 - (v) are inconsistent with the requirements of section 515 of the Treasury and General Government Appropriations Act, 2001 (44 U.S.C. 3516 note), or the guidance issued pursuant to that provision, in particular those regulations that rely in whole or in part on data, information, or methods that are not publicly available or that are insufficiently transparent to meet the standard for reproducibility; or
 - (vi) derive from or implement Executive Orders or other Presidential directives that have been subsequently rescinded or substantially modified.
- (e) In performing the evaluation described in subsection (d) of this section, each Regulatory Reform Task Force shall seek input and other assistance, as permitted by law, from entities significantly affected by Federal regulations, including State, local, and tribal governments, small businesses, consumers, non-governmental organizations, and trade associations.
- (f) When implementing the regulatory offsets required by Executive Order 13771, each agency head should prioritize, to the extent permitted by law, those regulations that the agency's Regulatory Reform Task Force has identified as being outdated, unnecessary, or ineffective pursuant to subsection (d)(ii) of this section.
- (g) Within 90 days of the date of this order, and on a schedule determined by the agency head thereafter, each Regulatory Reform Task Force shall provide a report to the agency head detailing the agency's progress toward the following goals:
 - (i) improving implementation of regulatory reform initiatives and policies pursuant to section 2 of this order; and
 - (ii) identifying regulations for repeal, replacement, or modification.
- **Sec. 4.** Accountability. Consistent with the policy set forth in section 1 of this order, each agency should measure its progress in performing the tasks outlined in section 3 of this order.
- (a) Agencies listed in section 901(b)(1) of title 31, United States Code, shall incorporate in their annual performance plans (required under the Government Performance and Results Act, as amended (see 31 U.S.C. 1115(b))), performance indicators that measure progress toward the two goals listed in section 3(g) of this order. Within 60 days of the date of this order, the Director of the Office of Management and Budget (Director) shall issue guidance regarding the implementation of this subsection. Such guidance may also address how agencies not otherwise covered under this subsection should be held accountable for compliance with this order.
- (b) The head of each agency shall consider the progress toward the two goals listed in section 3(g) of this order in assessing the performance of the Regulatory Reform Task Force and, to the extent permitted by law, those individuals responsible for developing and issuing agency regulations.
- **Sec. 5.** Waiver. Upon the request of an agency head, the Director may waive compliance with this order if the Director determines that the agency generally issues very few or no regulations (as defined in section 4 of Executive Order 13771). The Director may revoke a waiver at any time. The Director shall publish, at least once every 3 months, a list of agencies with current waivers.

- **Sec.** 6. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:
 - (i) the authority granted by law to an executive department or agency, or the head thereof; or
 - (ii) the functions of the Director relating to budgetary, administrative, or legislative proposals.
- (b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.
- (c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

THE WHITE HOUSE, February 24, 2017.

[FR Doc. 2017–04107 Filed 2–28–17; 11:15 am] Billing code 3295–F7–P A MARKAMINA

Federal Register

Vol. 82, No. 61

Presidential Documents

Document 15-20

Title 3—

Executive Order 13783 of March 28, 2017

The President

Friday, March 31, 2017

Promoting Energy Independence and Economic Growth

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows:

Section 1. *Policy*. (a) It is in the national interest to promote clean and safe development of our Nation's vast energy resources, while at the same time avoiding regulatory burdens that unnecessarily encumber energy production, constrain economic growth, and prevent job creation. Moreover, the prudent development of these natural resources is essential to ensuring the Nation's geopolitical security.

- (b) It is further in the national interest to ensure that the Nation's electricity is affordable, reliable, safe, secure, and clean, and that it can be produced from coal, natural gas, nuclear material, flowing water, and other domestic sources, including renewable sources.
- (c) Accordingly, it is the policy of the United States that executive departments and agencies (agencies) immediately review existing regulations that potentially burden the development or use of domestically produced energy resources and appropriately suspend, revise, or rescind those that unduly burden the development of domestic energy resources beyond the degree necessary to protect the public interest or otherwise comply with the law.
- (d) It further is the policy of the United States that, to the extent permitted by law, all agencies should take appropriate actions to promote clean air and clean water for the American people, while also respecting the proper roles of the Congress and the States concerning these matters in our constitutional republic.
- (e) It is also the policy of the United States that necessary and appropriate environmental regulations comply with the law, are of greater benefit than cost, when permissible, achieve environmental improvements for the American people, and are developed through transparent processes that employ the best available peer-reviewed science and economics.
- **Sec. 2.** Immediate Review of All Agency Actions that Potentially Burden the Safe, Efficient Development of Domestic Energy Resources. (a) The heads of agencies shall review all existing regulations, orders, guidance documents, policies, and any other similar agency actions (collectively, agency actions) that potentially burden the development or use of domestically produced energy resources, with particular attention to oil, natural gas, coal, and nuclear energy resources. Such review shall not include agency actions that are mandated by law, necessary for the public interest, and consistent with the policy set forth in section 1 of this order.
- (b) For purposes of this order, "burden" means to unnecessarily obstruct, delay, curtail, or otherwise impose significant costs on the siting, permitting, production, utilization, transmission, or delivery of energy resources.
- (c) Within 45 days of the date of this order, the head of each agency with agency actions described in subsection (a) of this section shall develop and submit to the Director of the Office of Management and Budget (OMB Director) a plan to carry out the review required by subsection (a) of this section. The plans shall also be sent to the Vice President, the Assistant to the President for Economic Policy, the Assistant to the President for Domestic Policy, and the Chair of the Council on Environmental Quality. The head of any agency who determines that such agency does not have

agency actions described in subsection (a) of this section shall submit to the OMB Director a written statement to that effect and, absent a determination by the OMB Director that such agency does have agency actions described in subsection (a) of this section, shall have no further responsibilities under this section.

- (d) Within 120 days of the date of this order, the head of each agency shall submit a draft final report detailing the agency actions described in subsection (a) of this section to the Vice President, the OMB Director, the Assistant to the President for Economic Policy, the Assistant to the President for Domestic Policy, and the Chair of the Council on Environmental Quality. The report shall include specific recommendations that, to the extent permitted by law, could alleviate or eliminate aspects of agency actions that burden domestic energy production.
- (e) The report shall be finalized within 180 days of the date of this order, unless the OMB Director, in consultation with the other officials who receive the draft final reports, extends that deadline.
- (f) The OMB Director, in consultation with the Assistant to the President for Economic Policy, shall be responsible for coordinating the recommended actions included in the agency final reports within the Executive Office of the President.
- (g) With respect to any agency action for which specific recommendations are made in a final report pursuant to subsection (e) of this section, the head of the relevant agency shall, as soon as practicable, suspend, revise, or rescind, or publish for notice and comment proposed rules suspending, revising, or rescinding, those actions, as appropriate and consistent with law. Agencies shall endeavor to coordinate such regulatory reforms with their activities undertaken in compliance with Executive Order 13771 of January 30, 2017 (Reducing Regulation and Controlling Regulatory Costs). Sec. 3. Rescission of Certain Energy and Climate-Related Presidential and Regulatory Actions. (a) The following Presidential actions are hereby revoked:
 - (i) Executive Order 13653 of November 1, 2013 (Preparing the United States for the Impacts of Climate Change);
 - (ii) The Presidential Memorandum of June 25, 2013 (Power Sector Carbon Pollution Standards);
 - (iii) The Presidential Memorandum of November 3, 2015 (Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment); and
 - (iv) The Presidential Memorandum of September 21, 2016 (Climate Change and National Security).
 - (b) The following reports shall be rescinded:
 - (i) The Report of the Executive Office of the President of June 2013 (The President's Climate Action Plan); and
 - (ii) The Report of the Executive Office of the President of March 2014 (Climate Action Plan Strategy to Reduce Methane Emissions).
- (c) The Council on Environmental Quality shall rescind its final guidance entitled "Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews," which is referred to in "Notice of Availability," 81 Fed. Reg. 51866 (August 5, 2016).
- (d) The heads of all agencies shall identify existing agency actions related to or arising from the Presidential actions listed in subsection (a) of this section, the reports listed in subsection (b) of this section, or the final guidance listed in subsection (c) of this section. Each agency shall, as soon as practicable, suspend, revise, or rescind, or publish for notice and comment proposed rules suspending, revising, or rescinding any such actions, as appropriate and consistent with law and with the policies set forth in section 1 of this order.

- Sec. 4. Review of the Environmental Protection Agency's "Clean Power Plan" and Related Rules and Agency Actions. (a) The Administrator of the Environmental Protection Agency (Administrator) shall immediately take all steps necessary to review the final rules set forth in subsections (b)(i) and (b)(ii) of this section, and any rules and guidance issued pursuant to them, for consistency with the policy set forth in section 1 of this order and, if appropriate, shall, as soon as practicable, suspend, revise, or rescind the guidance, or publish for notice and comment proposed rules suspending, revising, or rescinding those rules. In addition, the Administrator shall immediately take all steps necessary to review the proposed rule set forth in subsection (b)(iii) of this section, and, if appropriate, shall, as soon as practicable, determine whether to revise or withdraw the proposed rule.
 - (b) This section applies to the following final or proposed rules:
 - (i) The final rule entitled "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units," 80 Fed. Reg. 64661 (October 23, 2015) (Clean Power Plan);
 - (ii) The final rule entitled "Standards of Performance for Greenhouse Gas Emissions from New, Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units," 80 Fed. Reg. 64509 (October 23, 2015); and
 - (iii) The proposed rule entitled "Federal Plan Requirements for Greenhouse Gas Emissions From Electric Utility Generating Units Constructed on or Before January 8, 2014; Model Trading Rules; Amendments to Framework Regulations; Proposed Rule," 80 Fed. Reg. 64966 (October 23, 2015).
- (c) The Administrator shall review and, if appropriate, as soon as practicable, take lawful action to suspend, revise, or rescind, as appropriate and consistent with law, the "Legal Memorandum Accompanying Clean Power Plan for Certain Issues," which was published in conjunction with the Clean Power Plan.
- (d) The Administrator shall promptly notify the Attorney General of any actions taken by the Administrator pursuant to this order related to the rules identified in subsection (b) of this section so that the Attorney General may, as appropriate, provide notice of this order and any such action to any court with jurisdiction over pending litigation related to those rules, and may, in his discretion, request that the court stay the litigation or otherwise delay further litigation, or seek other appropriate relief consistent with this order, pending the completion of the administrative actions described in subsection (a) of this section.
- **Sec. 5**. Review of Estimates of the Social Cost of Carbon, Nitrous Oxide, and Methane for Regulatory Impact Analysis. (a) In order to ensure sound regulatory decision making, it is essential that agencies use estimates of costs and benefits in their regulatory analyses that are based on the best available science and economics.
- (b) The Interagency Working Group on Social Cost of Greenhouse Gases (IWG), which was convened by the Council of Economic Advisers and the OMB Director, shall be disbanded, and the following documents issued by the IWG shall be withdrawn as no longer representative of governmental policy:
 - (i) Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866 (February 2010);
 - (ii) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (May 2013);
 - (iii) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (November 2013);
 - (iv) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (July 2015);
 - (v) Addendum to the Technical Support Document for Social Cost of Carbon: Application of the Methodology to Estimate the Social Cost of Methane and the Social Cost of Nitrous Oxide (August 2016); and

- (vi) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (August 2016).
- (c) Effective immediately, when monetizing the value of changes in greenhouse gas emissions resulting from regulations, including with respect to the consideration of domestic versus international impacts and the consideration of appropriate discount rates, agencies shall ensure, to the extent permitted by law, that any such estimates are consistent with the guidance contained in OMB Circular A–4 of September 17, 2003 (Regulatory Analysis), which was issued after peer review and public comment and has been widely accepted for more than a decade as embodying the best practices for conducting regulatory cost-benefit analysis.
- **Sec. 6.** Federal Land Coal Leasing Moratorium. The Secretary of the Interior shall take all steps necessary and appropriate to amend or withdraw Secretary's Order 3338 dated January 15, 2016 (Discretionary Programmatic Environmental Impact Statement (PEIS) to Modernize the Federal Coal Program), and to lift any and all moratoria on Federal land coal leasing activities related to Order 3338. The Secretary shall commence Federal coal leasing activities consistent with all applicable laws and regulations.
- **Sec. 7**. Review of Regulations Related to United States Oil and Gas Development. (a) The Administrator shall review the final rule entitled "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources," 81 Fed. Reg. 35824 (June 3, 2016), and any rules and guidance issued pursuant to it, for consistency with the policy set forth in section 1 of this order and, if appropriate, shall, as soon as practicable, suspend, revise, or rescind the guidance, or publish for notice and comment proposed rules suspending, revising, or rescinding those rules.
- (b) The Secretary of the Interior shall review the following final rules, and any rules and guidance issued pursuant to them, for consistency with the policy set forth in section 1 of this order and, if appropriate, shall, as soon as practicable, suspend, revise, or rescind the guidance, or publish for notice and comment proposed rules suspending, revising, or rescinding those rules:
 - (i) The final rule entitled "Oil and Gas; Hydraulic Fracturing on Federal and Indian Lands," 80 Fed. Reg. 16128 (March 26, 2015);
 - (ii) The final rule entitled "General Provisions and Non-Federal Oil and Gas Rights," 81 Fed. Reg. 77972 (November 4, 2016);
 - (iii) The final rule entitled "Management of Non-Federal Oil and Gas Rights," 81 Fed. Reg. 79948 (November 14, 2016); and
 - (iv) The final rule entitled "Waste Prevention, Production Subject to Royalties, and Resource Conservation," 81 Fed. Reg. 83008 (November 18, 2016).
- (c) The Administrator or the Secretary of the Interior, as applicable, shall promptly notify the Attorney General of any actions taken by them related to the rules identified in subsections (a) and (b) of this section so that the Attorney General may, as appropriate, provide notice of this order and any such action to any court with jurisdiction over pending litigation related to those rules, and may, in his discretion, request that the court stay the litigation or otherwise delay further litigation, or seek other appropriate relief consistent with this order, until the completion of the administrative actions described in subsections (a) and (b) of this section.
- **Sec. 8**. *General Provisions*. (a) Nothing in this order shall be construed to impair or otherwise affect:
 - (i) the authority granted by law to an executive department or agency, or the head thereof; or
 - (ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.
- (b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A und somme

THE WHITE HOUSE, March 28, 2017.

[FR Doc. 2017–06576 Filed 3–30–17; 11:15 am] Billing code 3295–F7–P

Presidential Documents

Executive Order 13771 of January 30, 2017

Reducing Regulation and Controlling Regulatory Costs

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the Budget and Accounting Act of 1921, as amended (31 U.S.C. 1101 *et seq.*), section 1105 of title 31, United States Code, and section 301 of title 3, United States Code, it is hereby ordered as follows:

Section 1. Purpose. It is the policy of the executive branch to be prudent and financially responsible in the expenditure of funds, from both public and private sources. In addition to the management of the direct expenditure of taxpayer dollars through the budgeting process, it is essential to manage the costs associated with the governmental imposition of private expenditures required to comply with Federal regulations. Toward that end, it is important that for every one new regulation issued, at least two prior regulations be identified for elimination, and that the cost of planned regulations be prudently managed and controlled through a budgeting process.

- **Sec. 2**. Regulatory Cap for Fiscal Year 2017. (a) Unless prohibited by law, whenever an executive department or agency (agency) publicly proposes for notice and comment or otherwise promulgates a new regulation, it shall identify at least two existing regulations to be repealed.
- (b) For fiscal year 2017, which is in progress, the heads of all agencies are directed that the total incremental cost of all new regulations, including repealed regulations, to be finalized this year shall be no greater than zero, unless otherwise required by law or consistent with advice provided in writing by the Director of the Office of Management and Budget (Director).
- (c) In furtherance of the requirement of subsection (a) of this section, any new incremental costs associated with new regulations shall, to the extent permitted by law, be offset by the elimination of existing costs associated with at least two prior regulations. Any agency eliminating existing costs associated with prior regulations under this subsection shall do so in accordance with the Administrative Procedure Act and other applicable law.
- (d) The Director shall provide the heads of agencies with guidance on the implementation of this section. Such guidance shall address, among other things, processes for standardizing the measurement and estimation of regulatory costs; standards for determining what qualifies as new and offsetting regulations; standards for determining the costs of existing regulations that are considered for elimination; processes for accounting for costs in different fiscal years; methods to oversee the issuance of rules with costs offset by savings at different times or different agencies; and emergencies and other circumstances that might justify individual waivers of the requirements of this section. The Director shall consider phasing in and updating these requirements.
- **Sec. 3.** Annual Regulatory Cost Submissions to the Office of Management and Budget. (a) Beginning with the Regulatory Plans (required under Executive Order 12866 of September 30, 1993, as amended, or any successor order) for fiscal year 2018, and for each fiscal year thereafter, the head of each agency shall identify, for each regulation that increases incremental cost, the offsetting regulations described in section 2(c) of this order, and provide the agency's best approximation of the total costs or savings associated with each new regulation or repealed regulation.

- (b) Each regulation approved by the Director during the Presidential budget process shall be included in the Unified Regulatory Agenda required under Executive Order 12866, as amended, or any successor order.
- (c) Unless otherwise required by law, no regulation shall be issued by an agency if it was not included on the most recent version or update of the published Unified Regulatory Agenda as required under Executive Order 12866, as amended, or any successor order, unless the issuance of such regulation was approved in advance in writing by the Director.
- (d) During the Presidential budget process, the Director shall identify to agencies a total amount of incremental costs that will be allowed for each agency in issuing new regulations and repealing regulations for the next fiscal year. No regulations exceeding the agency's total incremental cost allowance will be permitted in that fiscal year, unless required by law or approved in writing by the Director. The total incremental cost allowance may allow an increase or require a reduction in total regulatory cost.
- (e) The Director shall provide the heads of agencies with guidance on the implementation of the requirements in this section.
- **Sec. 4**. *Definition*. For purposes of this order the term "regulation" or "rule" means an agency statement of general or particular applicability and future effect designed to implement, interpret, or prescribe law or policy or to describe the procedure or practice requirements of an agency, but does not include:
- (a) regulations issued with respect to a military, national security, or foreign affairs function of the United States;
- (b) regulations related to agency organization, management, or personnel; or
 - (c) any other category of regulations exempted by the Director.
- **Sec. 5**. *General Provisions*. (a) Nothing in this order shall be construed to impair or otherwise affect:
 - (i) the authority granted by law to an executive department or agency, or the head thereof; or
 - (ii) the functions of the Director relating to budgetary, administrative, or legislative proposals.
- (b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A MALAMAN

THE WHITE HOUSE, January 30, 2017.

[FR Doc. 2017–02451 Filed 2–2–17; 11:15 am] Billing code 3295–F7–P

Presidential Documents

Executive Order 13992 of January 20, 2021

Revocation of Certain Executive Orders Concerning Federal Regulation

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered that:

Section 1. *Policy*. It is the policy of my Administration to use available tools to confront the urgent challenges facing the Nation, including the coronavirus disease 2019 (COVID–19) pandemic, economic recovery, racial justice, and climate change. To tackle these challenges effectively, executive departments and agencies (agencies) must be equipped with the flexibility to use robust regulatory action to address national priorities. This order revokes harmful policies and directives that threaten to frustrate the Federal Government's ability to confront these problems, and empowers agencies to use appropriate regulatory tools to achieve these goals.

Sec. 2. Revocation of Orders. Executive Order 13771 of January 30, 2017 (Reducing Regulation and Controlling Regulatory Costs), Executive Order 13777 of February 24, 2017 (Enforcing the Regulatory Reform Agenda), Executive Order 13875 of June 14, 2019 (Evaluating and Improving the Utility of Federal Advisory Committees), Executive Order 13891 of October 9, 2019 (Promoting the Rule of Law Through Improved Agency Guidance Documents), Executive Order 13892 of October 9, 2019 (Promoting the Rule of Law Through Transparency and Fairness in Civil Administrative Enforcement and Adjudication), and Executive Order 13893 of October 10, 2019 (Increasing Government Accountability for Administrative Actions by Reinvigorating Administrative PAYGO), are hereby revoked.

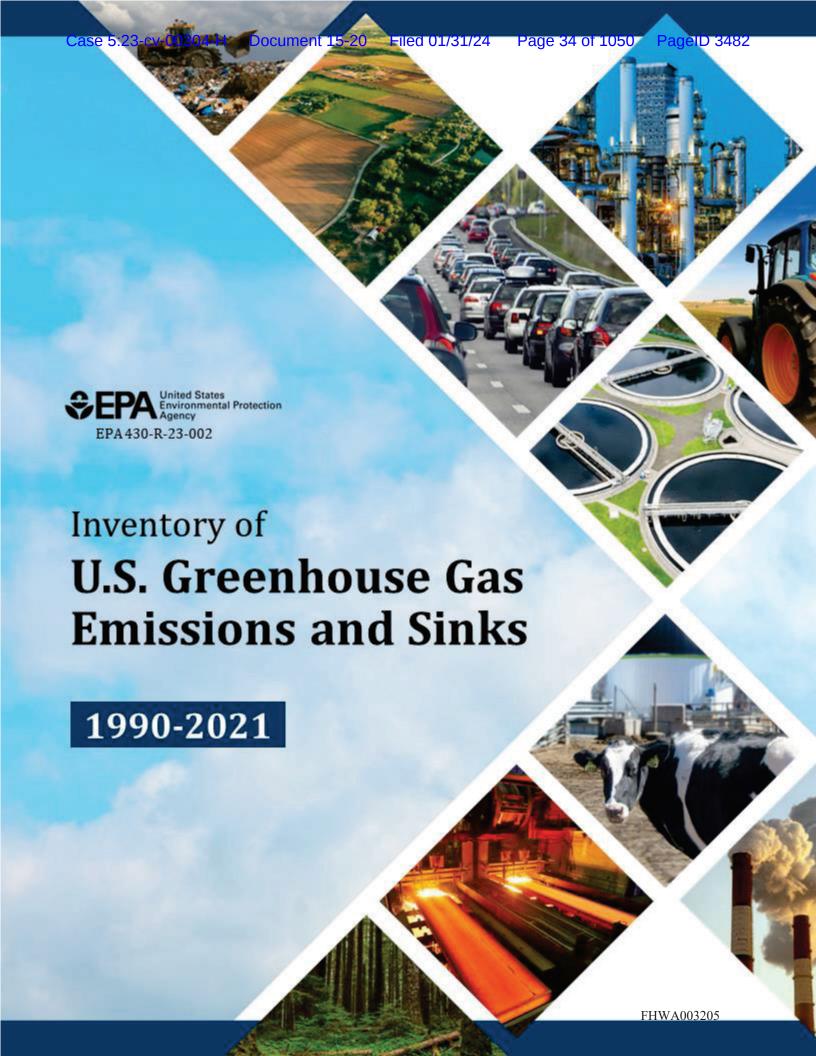
- Sec. 3. Implementation. The Director of the Office of Management and Budget and the heads of agencies shall promptly take steps to rescind any orders, rules, regulations, guidelines, or policies, or portions thereof, implementing or enforcing the Executive Orders identified in section 2 of this order, as appropriate and consistent with applicable law, including the Administrative Procedure Act, 5 U.S.C. 551 et seq. If in any case such rescission cannot be finalized immediately, the Director and the heads of agencies shall promptly take steps to provide all available exemptions authorized by any such orders, rules, regulations, guidelines, or policies, as appropriate and consistent with applicable law. In addition, any personnel positions, committees, task forces, or other entities established pursuant to the Executive Orders identified in section 2 of this order, including the regulatory reform officer positions and regulatory reform task forces established by sections 2 and 3 of Executive Order 13777, shall be abolished, as appropriate and consistent with applicable law.
- **Sec. 4.** *General Provisions.* (a) Nothing in this order shall be construed to impair or otherwise affect:
 - (i) the authority granted by law to an executive department or agency, or the head thereof; or
 - (ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.
- (b) This order shall be implemented in a manner consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

THE WHITE HOUSE,

January 20, 2021.

[FR Doc. 2021–01767 Filed 1–22–21; 11:15 am] Billing code 3295–F1–P



Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 35 of 1050 PageID 3483

Front cover photo credit for cow and digester: Vanguard Renewables.

HOW TO OBTAIN COPIES

You can electronically download this document on the U.S. EPA's homepage at https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

All data tables of this document for the full time series 1990 through 2021, inclusive, will be made available within 4-6 weeks after publication of the final report at the internet site mentioned above.

RECOMMENDED CITATION

EPA (2023) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021. U.S. Environmental Protection Agency, EPA 430-R-23-002. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2021.

FOR FURTHER INFORMATION

Contact Ms. Mausami Desai, Environmental Protection Agency, (202) 343-9381, desai.mausami@epa.gov, or Mr. Vincent Camobreco, Environmental Protection Agency, (202) 564–9043, camobreco.vincent@epa.gov. For more information regarding climate change and greenhouse gas emissions, see the EPA web site at https://www.epa.gov/ghgemissions.

Acknowledgments

The Environmental Protection Agency would like to acknowledge the many individual and organizational contributors to this document, without whose efforts this report would not be complete. Although the complete list of researchers, government employees, and consultants who have provided technical and editorial support is too long to list here, EPA would like to thank some key contributors and reviewers whose work has significantly improved this year's report.

Within EPA's Office of Atmospheric Protection (OAP), development and compilation of emissions from fuel combustion was led by Vincent Camobreco. Sarah Roberts (EPA Office of Transportation and Air Quality) directed the work to compile estimates of emissions from mobile sources. Work on fugitive methane emissions from the Energy sector was directed by Melissa Weitz and Chris Sherry. Development and compilation of emissions estimates for the Waste sector were led by Lauren Aepli and Mausami Desai. Tom Wirth and John Steller directed work to compile estimates for the Agriculture and the Land Use, Land-Use Change, and Forestry chapters with support from Jake Beaulieu (ORD) on compiling the inventories for CO₂ and CH₄ associated with flooded lands. Development and compilation of Industrial Processes and Product Use (IPPU) CO₂, CH₄, and N₂O emissions was directed by Amanda Chiu and Vincent Camobreco. Development and compilation of emissions of HFCs, PFCs, SF₆, and NF₃ from the IPPU sector was directed by Deborah Ottinger, Dave Godwin, Stephanie Bogle, and Kersey Manliclic. Cross-cutting work was directed by Mausami Desai. We thank Bill Irving for general advice, guidance, and cross-cutting review.

We also thank Kenna Rewcastle and Martin Wolf (AAAS Science & Technology Policy Fellows hosted by the Office of Atmospheric Protection) for their advice and review in areas such as agricultural, land use, land-use change and forestry, and industrial processes and product use estimates, respectively.

Other EPA offices and programs also contributed data, analysis, and technical review for this report. The Office of Atmospheric Protection's Greenhouse Gas Reporting Program (OAP) staff facilitated aggregation and review of facility-level data for use in the Inventory, in particular aggregation of confidential business information data. The Office of Transportation and Air Quality and the Office of Air Quality Planning and Standards provided analysis for precursor estimates and review for several of the source categories (i.e., natural gas and petroleum systems) included in this report. The Office of Research and Development conducted field research and developed estimates associated with flooded lands. The Office of Land and Emergency Management also contributed analysis and research.

The Energy Information Administration and the Department of Energy contributed invaluable data and analysis on numerous energy-related topics. William Sanchez at EIA provided annual energy data that are used in fossil fuel combustion estimates. Other government agencies have contributed data as well, including the U.S. Geological Survey, the Federal Highway Administration, the Department of Transportation, the Bureau of Transportation Statistics, the Department of Commerce, the Mine Safety and Health Administration, and the National Agricultural Statistics Service.

We thank the Department of Defense (David Asiello, DoD and Matthew Cleaver of Leidos) for compiling the data on military bunker fuel use.

We thank the Federal Aviation Administration (Ralph Lovinelli and Jeetendra Upadhyay) for compiling the inventory of emissions from commercial aircraft jet fuel consumption.

We thank the United States Department of Agriculture's Office of the Chief Economist (Meg Xiarchos) for providing data on agricultural energy use.

We thank the U.S. Forest Service (Grant Domke, Brian Walters, Jim Smith and Mike Nichols) for compiling the inventories for CO₂, CH₄, and N₂O fluxes associated with forest land.

We thank the Department of Agriculture's Agricultural Research Service (Stephen Del Grosso) and the Natural Resource Ecology Laboratory and Department of Statistics at Colorado State University (Stephen Ogle, Bill Parton, F. Jay Breidt, Shannon Spencer, Alisa Keyser, Teng Liu, Ryan Scheiderer, Veronica Thompson, Doug Vander Wilt, Stephen Williams, Guhan Dheenadayalan Sivakami) for compiling the inventories for CH₄ emissions, N₂O emissions, and CO₂ fluxes associated with soils in croplands, grasslands, and settlements.

We thank the National Oceanic and Atmospheric Administration (NOAA) (Nate Herold, Ben DeAngelo and Meredith Muth), Silvestrum Climate Associates (Stephen Crooks, Lisa Schile Beers, Rebeca Brenes), the Smithsonian Environmental Research Center (J. Patrick Megonigal, James Holmquist and Meng Lu), and Florida International University (Tiffany Troxler) as well as members of the U.S. Coastal Wetland Carbon Working Group for compiling inventories of land use change, soil carbon stocks and stock change, CH₄ emissions, and N₂O emissions from aquaculture in coastal wetlands. We also thank NOAA (Stephen Montzka and Lei Hu) for information on atmospheric measurements and derived emissions of HFCs and SF₆.

We thank Marian Martin Van Pelt, Leslie Chinery, Alexander Lataille, and the full Inventory team at ICF including Diana Pape, Robert Lanza, Mollie Averyt, Larry O'Rourke, Deborah Harris, Rebecca Ferenchiak, Fiona Wissell, Bikash Acharya, Mollie Carroll, Kyle Herdegen, Hazelle Tomlin, Deep Shah, Lou Browning, Sarah Whitlock, David Landolfi, Emily Carr, Abby Wiseman, Georgia Kerkezis, Katie O'Malley, Emily Adkins, Zeyu Hu, Alex Da Silva, Shubh Jain, Alida Monaco, Kenny Yerardi, Hannah Krauss, Sophie Johnson, Leah Hartung, Molly Rickles, Audrey Ichida, Seth Hartley, Max Kaffel, Sam Pournazer, and Ajo Rabemiarisoa for technical support in compiling synthesis information across the report and preparing many of the individual analyses for specific report chapters including fluorinated emissions and fuel combustion.

We thank Eastern Research Group for their analytical support. Deborah Bartram, Kara Edquist and Tara Stout support the development of emissions estimates for wastewater. Kara Edquist, Cortney Itle, Amber Allen, Spencer Sauter, Tara Stout, and Sarah Wagner support the development of emission estimates for Manure Management, Enteric Fermentation, Peatlands (included in Wetlands Remaining Wetlands), and Landfilled Yard Trimmings and Food Scraps (included in Settlements Remaining Settlements). Brandon Long, Gopi Manne, Marty Wolf, and Sarah Downes, support the development of estimates for Natural Gas and Petroleum Systems. Gopi Manne and Tara Stout support the development of emission estimates for coal mine methane.

Finally, we thank the RTI International team: Kate Bronstein, Emily Thompson, Jeff Coburn, and Keith Weitz for their analytical support in development of the estimates of emissions from landfills; Jason Goldsmith, Melissa Icenhour, Michael Laney, David Randall, Gabrielle Raymond, Karen Schaffner, Riley Vanek, Ricky Strott, Libby Robinson, Matt Hakos, and Jeremy Kaelin for their analytical support in development of IPPU CO₂, CH₄, and N₂O emissions; and Tiffany Moore and Matt Hakos for their analytical support on disaggregating industrial sector fossil fuel combustion emissions.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 39 of 1050 PageID 3487

Preface

The United States Environmental Protection Agency (EPA) prepares the official U.S. Inventory of Greenhouse Gas Emissions and Sinks to fulfill annual existing commitments under the United Nations Framework Convention on Climate Change (UNFCCC). Under UNFCCC Article 4 and decisions at the First, Second, Fifth and Nineteenth Conference of Parties, national inventories for UNFCCC Annex I parties should be provided to the UNFCCC Secretariat each year by April 15.

In an effort to engage the public and researchers across the country, the EPA has instituted an annual public review and comment process for this document. The availability of the draft document on the EPA Greenhouse Gas Emissions web site was announced via Federal Register Notice. The public comment period covered a 30-day period from February 15 through March 17, 2023, and comments received during the public review period were posted to the docket EPA-HQ-OAR-2023-0001. Comments received after the closure of the public comment period will be considered for the next edition of this annual report. Responses to comments are typically posted to EPA's website 2-4 weeks following publication of the final report in April 2023.

Table of Contents

TABLE OF CONTENTS	VI
LIST OF TABLES, FIGURES, BOXES, AND EQUATIONS	X
EXECUTIVE SUMMARY	ES-1
ES.1 Background Information	ES-2
ES.2 Recent Trends in U.S. Greenhouse Gas Emissions and Sinks	ES-4
ES.3 Overview of Sector Emissions and Trends	ES-16
ES.4 Other Information	ES-21
1. INTRODUCTION	1-1
1.1 Background Information	1-3
1.2 National Inventory Arrangements	1-12
1.3 Inventory Process	1-14
1.4 Methodology and Data Sources	1-17
1.5 Key Categories	1-18
1.6 Quality Assurance and Quality Control (QA/QC)	1-24
1.7 Uncertainty Analysis of Emission Estimates	1-29
1.8 Completeness	1-32
1.9 Organization of Report	1-32
2. TRENDS IN GREENHOUSE GAS EMISSIONS AND REMOVALS	2-1
2.1 Overview of U.S. Greenhouse Gas Emissions and Sinks Trends	2-1
2.2 Emissions by Economic Sector	2-28
2.3 Precursor Greenhouse Gas Emissions (CO, NO _x , NMVOCs, and SO ₂)	2-40
3. ENERGY	3-1
3.1 Fossil Fuel Combustion (CRF Source Category 1A)	3-7
3.2 Carbon Emitted from Non-Energy Uses of Fossil Fuels (CRF Source Category	/ 1A) 3-50
3.3 Incineration of Waste (CRF Source Category 1A5)	3-58
3.4 Coal Mining (CRF Source Category 1B1a)	3-62
3.5 Abandoned Underground Coal Mines (CRF Source Category 1B1a)	3-70

3.6	Petroleum Systems (CRF Source Category 1B2a)	3-75
3.7	Natural Gas Systems (CRF Source Category 1B2b)	3-92
3.8	Abandoned Oil and Gas Wells (CRF Source Categories 1B2a and 1B2b)	3-111
3.9	International Bunker Fuels (CRF Source Category 1: Memo Items)	3-116
3.10	Biomass and Biofuels Consumption (CRF Source Category 1A)	3-121
3.11	Energy Sources of Precursor Greenhouse Gases	3-125
4.	INDUSTRIAL PROCESSES AND PRODUCT USE	4- 1
4.1	Cement Production (CRF Source Category 2A1)	4-10
4.2	Lime Production (CRF Source Category 2A2)	4-14
4.3	Glass Production (CRF Source Category 2A3)	4-20
4.4	Other Process Uses of Carbonates (CRF Source Category 2A4)	4-25
4.5	Ammonia Production (CRF Source Category 2B1)	4-29
4.6	Urea Consumption for Non-Agricultural Purposes	4-35
4.7	Nitric Acid Production (CRF Source Category 2B2)	4-38
4.8	Adipic Acid Production (CRF Source Category 2B3)	4-43
4.9	Caprolactam, Glyoxal and Glyoxylic Acid Production (CRF Source Category 2B4)	4-47
4.10	Carbide Production and Consumption (CRF Source Category 2B5)	4-51
4.11	Titanium Dioxide Production (CRF Source Category 2B6)	4-55
4.12	Soda Ash Production (CRF Source Category 2B7)	4-59
4.13	Petrochemical Production (CRF Source Category 2B8)	4-62
4.14	HCFC-22 Production (CRF Source Category 2B9a)	4-70
4.15	Carbon Dioxide Consumption (CRF Source Category 2B10)	4-73
4.16	Phosphoric Acid Production (CRF Source Category 2B10)	4-77
4.17	Iron and Steel Production (CRF Source Category 2C1) and Metallurgical Coke Production	4-81
4.18	Ferroalloy Production (CRF Source Category 2C2)	4-93
4.19	Aluminum Production (CRF Source Category 2C3)	4-98
4.20	Magnesium Production and Processing (CRF Source Category 2C4)	4-105
4.21	Lead Production (CRF Source Category 2C5)	4-111
4.22	Zinc Production (CRF Source Category 2C6)	4-114
4.23	Electronics Industry (CRF Source Category 2E)	4-120
4.24	Substitution of Ozone Depleting Substances (CRF Source Category 2F)	4-139
4.25	Electrical Transmission and Distribution (CRF Source Category 2G1)	4-148
4.26	Nitrous Oxide from Product Uses (CRF Source Category 2G3)	4-160
4.27	Industrial Processes and Product Use Sources of Precursor Gases	4-164
5.	AGRICULTURE	5-1

5.1	Enteric Fermentation (CRF Source Category 3A)	5-4
5.2	Manure Management (CRF Source Category 3B)	5-12
5.3	Rice Cultivation (CRF Source Category 3C)	5-21
5.4	Agricultural Soil Management (CRF Source Category 3D)	5-28
5.5	Liming (CRF Source Category 3G)	5-48
5.6	Urea Fertilization (CRF Source Category 3H)	5-51
5.7	Field Burning of Agricultural Residues (CRF Source Category 3F)	5-53
6.	LAND USE, LAND-USE CHANGE, AND FORESTRY	6-1
6.1	Representation of the U.S. Land Base	6-9
6.2	Forest Land Remaining Forest Land (CRF Category 4A1)	6-25
6.3	Land Converted to Forest Land (CRF Source Category 4A2)	6-49
6.4	Cropland Remaining Cropland (CRF Category 4B1)	6-56
6.5	Land Converted to Cropland (CRF Category 4B2)	6-68
6.6	Grassland Remaining Grassland (CRF Category 4C1)	6-76
6.7	Land Converted to Grassland (CRF Category 4C2)	6-88
6.8	Wetlands Remaining Wetlands (CRF Category 4D1)	6-96
6.9	Land Converted to Wetlands (CRF Source Category 4D2)	6-139
6.10	Settlements Remaining Settlements (CRF Category 4E1)	6-161
6.11	Land Converted to Settlements (CRF Category 4E2)	6-182
6.12	Other Land Remaining Other Land (CRF Category 4F1)	6-189
6.13	Land Converted to Other Land (CRF Category 4F2)	6-189
7.	WASTE	7-1
7.1	Landfills (CRF Source Category 5A1)	7-4
7.2	Wastewater Treatment and Discharge (CRF Source Category 5D)	7-22
7.3	Composting (CRF Source Category 5B1)	7-57
7.4	Anaerobic Digestion at Biogas Facilities (CRF Source Category 5B2)	7-61
7.5	Waste Incineration (CRF Source Category 5C1)	7-67
7.6	Waste Sources of Precursor Greenhouse Gases	7-68
8.	OTHER	8-1
9.	RECALCULATIONS AND IMPROVEMENTS	9-1
10	REFERENCES AND ARRREVIATIONS	10-1

List of Tables, Figures, Boxes, and Equations

Tables

Table ES-1: Global Warming Potentials (100-Year Time Horizon) Used in this Report	ES-3
Table ES-2: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (MMT CO ₂ Eq.)	ES-5
Table ES-3: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector (MMT CO ₂ Eq.)	.ES-17
Table ES-4: U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO ₂ Eq.)	.ES-20
Table ES-5: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors (MMT CO ₂ Eq.)	.ES-22
Table ES-6: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed by Economic Sector (MMT CO ₂ Eq.)	
Table ES-7: Recent Trends in Various U.S. Data (Index 1990 = 100)	.ES-24
Table 1-1: Global Atmospheric Concentration, Rate of Concentration Change, and Atmospheric Lifetime of Selected Greenhouse Gases	1-5
Table 1-2: Global Warming Potentials and Atmospheric Lifetimes (Years) Used in this Report	1-10
Table 1-3: Comparison of 100-Year GWP values	1-11
Table 1-4: Summary of Key Categories for the United States (1990 and 2021) by Sector	1-19
Table 1-5: Estimated Overall Inventory Quantitative Uncertainty for 1990 (MMT CO₂ Eq. and Percent)	1-30
Table 1-6: Estimated Overall Inventory Quantitative Uncertainty for 2021 (MMT CO ₂ Eq. and Percent)	1-30
Table 1-7: Quantitative Assessment of Trend Uncertainty (MMT CO ₂ Eq. and Percent)	1-31
Table 1-8: IPCC Sector Descriptions	1-32
Table 1-9: List of Annexes	1-33
Table 2-1: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (MMT CO ₂ Eq.)	2-3
Table 2-2: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (kt)	2-6
Table 2-3: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector/Category (MMT CO ₂ Eq.	.) 2-9
Table 2-4: Emissions from Energy (MMT CO ₂ Eq.)	2-11
Table 2-5: CO ₂ Emissions from Fossil Fuel Combustion by End-Use Sector (MMT CO ₂ Eq.)	2-14
Table 2-6: Emissions from Industrial Processes and Product Use (MMT CO ₂ Eq.)	2-19
Table 2-7: Emissions from Agriculture (MMT CO ₂ Eq.)	2-22
Table 2-8: U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Fo (MMT CO ₂ Eq.)	-
Table 2-9: Emissions from Waste (MMT CO ₂ Eq.)	2-27
Table 2-10: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors (MMT CO₂ Eq. and Percent of Tota 2021)	
Table 2-11: Flectric Power-Related Greenhouse Gas Emissions (MMT CO ₂ Eq.)	2-32

Table 2-12: U.S. Greenhouse Gas Emissions by Economic Sector and Gas with Electricity-Related Emissions Distributed (MMT CO_2 Eq.) and Percent of Total in 2021	2-34
Table 2-13: Transportation-Related Greenhouse Gas Emissions (MMT CO ₂ Eq.)	2-36
Table 2-14: Recent Trends in Various U.S. Data (Index 1990 = 100)	2-39
Table 2-15: Emissions of NO _x , CO, NMVOCs, and SO ₂ (kt)	2-41
Table 3-1: CO ₂ , CH ₄ , and N ₂ O Emissions from Energy (MMT CO ₂ Eq.)	3-3
Table 3-2: CO ₂ , CH ₄ , and N ₂ O Emissions from Energy (kt)	3-4
Table 3-3: CO ₂ , CH ₄ , and N ₂ O Emissions from Fossil Fuel Combustion (MMT CO ₂ Eq.)	3-7
Table 3-4: CO ₂ , CH ₄ , and N ₂ O Emissions from Fossil Fuel Combustion (kt)	3-7
Table 3-5: CO ₂ Emissions from Fossil Fuel Combustion by Fuel Type and Sector (MMT CO ₂ Eq.)	3-8
Table 3-6: Annual Change in CO ₂ Emissions and Total 2021 CO ₂ Emissions from Fossil Fuel Combustion for Sel Fuels and Sectors (MMT CO ₂ Eq. and Percent)	
Table 3-7: CO ₂ Emissions from Stationary Fossil Fuel Combustion (MMT CO ₂ Eq.)	3-13
Table 3-8: CH ₄ Emissions from Stationary Combustion (MMT CO ₂ Eq.)	3-14
Table 3-9: N ₂ O Emissions from Stationary Combustion (MMT CO ₂ Eq.)	3-14
Table 3-10: CO ₂ , CH ₄ , and N ₂ O Emissions from Fossil Fuel Combustion by Sector (MMT CO ₂ Eq.)	3-15
Table 3-11: CO ₂ , CH ₄ , and N ₂ O Emissions from Fossil Fuel Combustion by End-Use Sector with Electricity Emis Distributed (MMT CO ₂ Eq.)	
Table 3-12: Electric Power Generation by Fuel Type (Percent)	3-17
Table 3-13: CO ₂ Emissions from Fossil Fuel Combustion in Transportation End-Use Sector (MMT CO ₂ Eq.)	3-27
Table 3-14: CH ₄ Emissions from Mobile Combustion (MMT CO ₂ Eq.)	3-29
Table 3-15: N ₂ O Emissions from Mobile Combustion (MMT CO ₂ Eq.)	3-30
Table 3-16: Carbon Intensity from Direct Fossil Fuel Combustion by Sector (MMT CO ₂ Eq./QBtu)	3-35
Table 3-17: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Energy-Related Fossil Fuel Combustion by Fuel Type and Sector (MMT CO ₂ Eq. and Percent)	
Table 3-18: Comparison of Electric Power Sector Emissions (MMT CO ₂ Eq. and Percent)	3-39
Table 3-19: Comparison of Emissions Factors (MMT Carbon/QBtu)	3-39
Table 3-20: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and N ₂ O Emissions from Energy-Related Stationary Combustion, Including Biomass (MMT CO ₂ Eq. and Percent)	3-44
Table 3-21: Approach 2 Quantitative Uncertainty Estimates for CH₄ and N₂O Emissions from Mobile Sources (CO₂ Eq. and Percent)	
Table 3-22: CO ₂ Emissions from Non-Energy Use Fossil Fuel Consumption (MMT CO ₂ Eq. and Percent C)	3-51
Table 3-23: Adjusted Consumption of Fossil Fuels for Non-Energy Uses (TBtu)	3-52
Table 3-24: 2021 Adjusted Non-Energy Use Fossil Fuel Consumption, Storage, and Emissions	3-53
Table 3-25: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Non-Energy Uses of Fossil (MMT CO ₂ Eq. and Percent)	
Table 3-26: Approach 2 Quantitative Uncertainty Estimates for Storage Factors of Non-Energy Uses of Fossil (Percent)	

Table 3-27: CO ₂ , CH ₄ , and N ₂ O Emissions from the Combustion of Waste (MMT CO ₂ Eq.)	3-59
Table 3-28: CO ₂ , CH ₄ , and N ₂ O Emissions from the Combustion of Waste (kt)	3-59
Table 3-29: Municipal Solid Waste Combusted (Short Tons)	3-59
Table 3-30: Calculated Fossil CO ₂ Content per Ton Waste Combusted (kg CO ₂ /Short Ton Combusted)	3-60
Table 3-31: CO ₂ Emissions from Combustion of Tires (MMT CO ₂ Eq.)	3-60
Table 3-32: Approach 2 Quantitative Uncertainty Estimates for CO_2 and N_2O from the Incineration of Waste CO_2 Eq. and Percent)	
Table 3-33: Coal Production (kt)	3-62
Table 3-34: CH ₄ Emissions from Coal Mining (MMT CO ₂ Eq.)	3-63
Table 3-35: CH ₄ Emissions from Coal Mining (kt)	3-63
Table 3-36: CO ₂ Emissions from Coal Mining (MMT CO ₂ Eq.)	3-66
Table 3-37: CO ₂ Emissions from Coal Mining (kt)	3-67
Table 3-38: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and CO ₂ Emissions from Coal Mining (MI Eq. and Percent)	
Table 3-39: CH ₄ Emissions from Abandoned Coal Mines (MMT CO ₂ Eq.)	3-71
Table 3-40: CH ₄ Emissions from Abandoned Coal Mines (kt)	3-71
Table 3-41: Number of Gassy Abandoned Mines Present in U.S. Basins in 2021, Grouped by Class According Post-Abandonment State	
Table 3-42: Approach 2 Quantitative Uncertainty Estimates for CH ₄ Emissions from Abandoned Undergroun Mines (MMT CO ₂ Eq. and Percent)	
$Table \ 3-43: \ Total \ Greenhouse \ Gas \ Emissions \ (CO_2, CH_4, and \ N_2O) \ from \ Petroleum \ Systems \ (MMT \ CO_2 \ Eq.)$	3-77
Table 3-44: CH ₄ Emissions from Petroleum Systems (MMT CO ₂ Eq.)	3-77
Table 3-45: CH ₄ Emissions from Petroleum Systems (kt CH ₄)	3-77
Table 3-46: CO ₂ Emissions from Petroleum Systems (MMT CO ₂)	3-78
Table 3-47: CO ₂ Emissions from Petroleum Systems (kt CO ₂)	3-78
Table 3-48: N ₂ O Emissions from Petroleum Systems (Metric Tons CO ₂ Eq.)	3-78
Table 3-49: N ₂ O Emissions from Petroleum Systems (Metric Tons N ₂ O)	3-78
Table 3-50: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and CO ₂ Emissions from Petroleum Syste (MMT CO ₂ Eq. and Percent)	
Table 3-51: Recalculations of CO ₂ in Petroleum Systems (MMT CO ₂)	3-85
Table 3-52: Recalculations of CH ₄ in Petroleum Systems (MMT CO ₂ Eq.)	3-85
Table 3-53: Pneumatic Controllers National CH ₄ Emissions (Metric Tons CH ₄)	3-86
Table 3-54: Production Equipment Leaks National CH ₄ Emissions (Metric Tons CH ₄)	3-87
Table 3-55: Chemical Injection Pumps National CH ₄ Emissions (Metric Tons CH ₄)	3-87
Table 3-56: Storage Tanks National CH ₄ Emissions (Metric Tons CH ₄)	3-88
Table 3-57: Storage Tanks National CO ₂ Emissions (kt CO ₂)	3-88
Table 3-58: Associated Gas Flaring National CO ₂ Emissions (kt CO ₂)	3-89

Table 3-59: Miscellaneous Production Flaring National CO_2 Emissions (kt CO_2	2)3-89
Table 3-60: Miscellaneous Production Flaring National CH ₄ Emissions (Metri	c Tons CH ₄) 3-89
Table 3-61: Offshore Production National CH ₄ Emissions (Metric Tons CH ₄)	3-90
Table 3-62: Refining National CO ₂ Emissions (kt CO ₂)	3-90
Table 3-63: Quantity of CO_2 Captured and Extracted for EOR Operations (kt	CO ₂) 3-92
Table 3-64: Geologic Sequestration Information Reported Under GHGRP Su	bpart RR 3-92
Table 3-65: Total Greenhouse Gas Emissions (CH ₄ , CO ₂ , and N ₂ O) from Natu	ral Gas Systems (MMT CO ₂ Eq.) 3-95
Table 3-66: CH ₄ Emissions from Natural Gas Systems (MMT CO ₂ Eq.)	3-95
Table 3-67: CH ₄ Emissions from Natural Gas Systems (kt)	3-96
Table 3-68: CO ₂ Emissions from Natural Gas Systems (MMT)	3-96
Table 3-69: CO ₂ Emissions from Natural Gas Systems (kt)	3-96
Table 3-70: N_2O Emissions from Natural Gas Systems (Metric Tons CO_2 Eq.).	3-96
Table 3-71: N_2O Emissions from Natural Gas Systems (Metric Tons N_2O)	3-97
Table 3-72: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and Non Natural Gas Systems (MMT CO ₂ Eq. and Percent)	
Table 3-73: Recalculations of CO ₂ in Natural Gas Systems (MMT CO ₂)	3-103
Table 3-74: Recalculations of CH ₄ in Natural Gas Systems (MMT CO ₂ Eq.)	3-103
Table 3-75: Pneumatic Controllers National CH ₄ Emissions (Metric Tons CH ₄) 3-104
Table 3-76: Storage Tanks National CH ₄ Emissions (Metric Tons CH ₄)	3-105
Table 3-77: Storage Tanks National CO ₂ Emissions (kt CO ₂)	3-105
Table 3-78: Production Equipment Leaks National CH ₄ Emissions (Metric To	ns CH ₄)3-106
Table 3-79: Chemical Injection Pumps National CH ₄ Emissions (Metric Tons	CH ₄) 3-106
Table 3-80: Liquids Unloading National CH ₄ Emissions (Metric Tons CH ₄)	3-107
Table 3-81: Liquids Unloading National CO ₂ Emissions (Metric Tons CO ₂)	3-107
Table 3-82: Miscellaneous Production Flaring National Emissions (kt CO ₂)	3-108
Table 3-83: Tanks National Emissions (Metric Tons CH ₄)	3-108
Table 3-84: Station Blowdowns National Emissions (Metric Tons CH ₄)	3-108
Table 3-85: Dehydrator Vents National Emissions (Metric Tons CH ₄)	3-109
Table 3-86: Dehydrator Vents National Emissions (kt CO ₂)	3-109
Table 3-87: Production Storage Tanks National Emissions (kt CO ₂)	3-109
Table 3-88: Processing Segment Flares National CO ₂ Emissions (kt CO ₂)	3-109
Table 3-89: AGR Vents National CO ₂ Emissions (kt CO ₂)	3-109
Table 3-90: Mains – Unprotected Steel National CH ₄ Emissions (Metric Tons	CH ₄)3-110
Table 3-91: Post-Meter National CH ₄ Emissions (Metric Tons CH ₄)	3-110
Table 3-92: CH ₄ Emissions from Abandoned Oil and Gas Wells (MMT CO ₂ Eq	.) 3-111
Table 3-93: CH ₄ Emissions from Abandoned Oil and Gas Wells (kt)	3-112

Table 3-94: CO ₂ Emissions from Abandoned Oil and Gas Wells (MMT CO ₂)	3-112
Table 3-95: CO ₂ Emissions from Abandoned Oil and Gas Wells (kt)	3-112
Table 3-96: Abandoned Oil Wells Activity Data, CH ₄ and CO ₂ Emissions (kt)	3-113
Table 3-97: Abandoned Gas Wells Activity Data, CH ₄ and CO ₂ Emissions (kt)	3-113
Table 3-98: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and CO ₂ Emissions from Petroleum and No Gas Systems (MMT CO ₂ Eq. and Percent)	
Table 3-99: CO ₂ , CH ₄ , and N ₂ O Emissions from International Bunker Fuels (MMT CO ₂ Eq.)	3-117
Table 3-100: CO ₂ , CH ₄ , and N ₂ O Emissions from International Bunker Fuels (kt)	3-117
Table 3-101: Aviation Jet Fuel Consumption for International Transport (Million Gallons)	3-118
Table 3-102: Marine Fuel Consumption for International Transport (Million Gallons)	3-119
Table 3-103: CO ₂ Emissions from Wood Consumption by End-Use Sector (MMT CO ₂ Eq.)	3-121
Table 3-104: CO ₂ Emissions from Wood Consumption by End-Use Sector (kt)	3-122
Table 3-105: CO ₂ Emissions from Biogenic Components of MSW (MMT CO ₂ Eq.)	3-122
Table 3-106: CO ₂ Emissions from Biogenic Components of MSW (kt)	3-122
Table 3-107: CO ₂ Emissions from Ethanol Consumption (MMT CO ₂ Eq.)	3-122
Table 3-108: CO ₂ Emissions from Ethanol Consumption (kt)	3-122
Table 3-109: CO ₂ Emissions from Biodiesel Consumption (MMT CO ₂ Eq.)	3-123
Table 3-110: CO ₂ Emissions from Biodiesel Consumption (kt)	3-123
Table 3-111: Calculated Biogenic CO ₂ Content per Ton Waste (kg CO ₂ /Short Ton Combusted)	3-123
Table 3-112: Woody Biomass Consumption by Sector (Trillion Btu)	3-124
Table 3-113: Ethanol Consumption by Sector (Trillion Btu)	3-124
Table 3-114: Biodiesel Consumption by Sector (Trillion Btu)	3-124
Table 3-115: NO _x , CO, NMVOC, and SO ₂ Emissions from Energy-Related Activities (kt)	3-126
Table 4-1: Emissions from Industrial Processes and Product Use (MMT CO ₂ Eq.)	4-4
Table 4-2: Emissions from Industrial Processes and Product Use (kt)	4-5
Table 4-3: CO ₂ Emissions from Cement Production (MMT CO ₂ Eq.)	. 4-11
Table 4-4: CO ₂ Emissions from Cement Production (kt CO ₂)	. 4-11
Table 4-5: Clinker Production (kt)	. 4-12
Table 4-6: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Cement Production (MMT of Eq. and Percent)	
Table 4-7: CO ₂ Emissions from Lime Production (MMT CO ₂ Eq.)	. 4-16
Table 4-8: Gross, Recovered, and Net CO ₂ Emissions from Lime Production (kt CO ₂)	. 4-16
Table 4-9: High-Calcium- and Dolomitic-Quicklime, High-Calcium- and Dolomitic-Hydrated, and Dead-Burned-Dolomite Lime Production (kt)	
Table 4-10: Adjusted Lime Production (kt)	. 4-17
Table 4-11: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Lime Production (MMT CO and Percent)	D₂ Eq. ⊿-19

Table 4-12:	CO ₂ Emissions from Glass Production (MMT CO ₂ Eq.)	1-21
Table 4-13:	CO ₂ Emissions from Glass Production (kt CO ₂)	1-21
	Limestone, Dolomite, Soda Ash, and Other Carbonates Used in Glass Production (kt) and Average duction Index for Glass and Glass Product Manufacturing4	1-23
	Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Glass Production (MMT CO ₂ :)	
Table 4-16:	CO ₂ Emissions from Other Process Uses of Carbonates (MMT CO ₂ Eq.)	1-26
Table 4-17:	CO ₂ Emissions from Other Process Uses of Carbonates (kt CO ₂)	1-26
Table 4-18:	Limestone and Dolomite Consumption (kt)	1-27
Table 4-19:	Soda Ash Consumption Not Associated with Glass Manufacturing (kt)	1-27
	Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Other Process Uses of (MMT CO ₂ Eq. and Percent)	1-29
Table 4-21:	CO ₂ Emissions from Ammonia Production (MMT CO ₂ Eq.)	1-31
Table 4-22:	CO ₂ Emissions from Ammonia Production (kt CO ₂)	1-31
	Total Ammonia Production, Total Urea Production, and Recovered CO ₂ Consumed for Urea Product	
	Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Ammonia Production (MMT Percent)	
Table 4-25:	CO ₂ Emissions from Urea Consumption for Non-Agricultural Purposes (MMT CO ₂ Eq.)	1-35
Table 4-26:	CO ₂ Emissions from Urea Consumption for Non-Agricultural Purposes (kt CO ₂)	1-36
Table 4-27:	Urea Production, Urea Applied as Fertilizer, Urea Imports, and Urea Exports (kt)	1-36
	Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Urea Consumption for Non-Purposes (MMT CO ₂ Eq. and Percent)	
Table 4-29:	N ₂ O Emissions from Nitric Acid Production (MMT CO ₂ Eq.)	1-39
Table 4-30:	N ₂ O Emissions from Nitric Acid Production (kt N ₂ O)	1-39
Table 4-31:	Nitric Acid Production (kt)	1-41
	Approach 2 Quantitative Uncertainty Estimates for N ₂ O Emissions from Nitric Acid Production (MM Percent)	
Table 4-33:	N ₂ O Emissions from Adipic Acid Production (MMT CO ₂ Eq.)	1-44
Table 4-34:	N ₂ O Emissions from Adipic Acid Production (kt N ₂ O)	1-44
Table 4-35:	Adipic Acid Production (kt)	1-46
	Approach 2 Quantitative Uncertainty Estimates for N ₂ O Emissions from Adipic Acid Production (MN Percent)	
Table 4-37:	N ₂ O Emissions from Caprolactam Production (MMT CO ₂ Eq.)	1-49
Table 4-38:	N ₂ O Emissions from Caprolactam Production (kt N ₂ O)	1-49
Table 4-39:	Caprolactam Production (kt)	1-50
	Approach 2 Quantitative Uncertainty Estimates for N ₂ O Emissions from Caprolactam, Glyoxal and id Production (MMT CO ₂ Eq. and Percent)4	1-50

Table 4-41: CO ₂ and CH ₄ Emissions from Silicon Carbide Production and Consumption (MMT CO ₂ Eq.)	4-52
Table 4-42: CO ₂ and CH ₄ Emissions from Silicon Carbide Production and Consumption (kt)	4-52
Table 4-43: Production and Consumption of Silicon Carbide (Metric Tons)	4-53
Table 4-44: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and CO ₂ Emissions from Silicon Carbide Production and Consumption (MMT CO ₂ Eq. and Percent)	4-54
Table 4-45: CO ₂ Emissions from Titanium Dioxide (MMT CO ₂ Eq.)	4-56
Table 4-46: CO ₂ Emissions from Titanium Dioxide (kt CO ₂)	4-56
Table 4-47: Titanium Dioxide Production (kt)	4-57
Table 4-48: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Titanium Dioxide Produc (MMT CO ₂ Eq. and Percent)	
Table 4-49: CO ₂ Emissions from Soda Ash Production (MMT CO ₂ Eq.)	4-60
Table 4-50: CO ₂ Emissions from Soda Ash Production (kt CO ₂)	4-60
Table 4-51: Trona Ore Used in Soda Ash Production (kt)	4-61
Table 4-52: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Soda Ash Production (MI CO ₂ Eq. and Percent)	
Table 4-53: CO ₂ and CH ₄ Emissions from Petrochemical Production (MMT CO ₂ Eq.)	4-63
Table 4-54: CO ₂ and CH ₄ Emissions from Petrochemical Production (kt)	4-64
Table 4-55: Production of Selected Petrochemicals (kt)	4-66
Table 4-56: Approach 2 Quantitative Uncertainty Estimates for CH ₄ Emissions from Petrochemical Productio CO ₂ Emissions from Petrochemical Production (MMT CO ₂ Eq. and Percent)	
Table 4-57: HFC-23 Emissions from HCFC-22 Production (MMT CO ₂ Eq.)	4-71
Table 4-58: HFC-23 Emissions from HCFC-22 Production (kt HFC-23)	4-71
Table 4-59: HCFC-22 Production (kt)	4-72
Table 4-60: Approach 2 Quantitative Uncertainty Estimates for HFC-23 Emissions from HCFC-22 Production (CO ₂ Eq. and Percent)	
Table 4-61: CO ₂ Emissions from CO ₂ Consumption (MMT CO ₂ Eq.)	4-74
Table 4-62: CO ₂ Emissions from CO ₂ Consumption (kt CO ₂)	4-74
Table 4-63: CO ₂ Production (kt CO ₂) and the Percent Used for Non-EOR Applications	4-75
Table 4-64: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from CO ₂ Consumption (MMT Eq. and Percent)	
Table 4-65: CO ₂ Emissions from Phosphoric Acid Production (MMT CO ₂ Eq.)	4-78
Table 4-66: CO ₂ Emissions from Phosphoric Acid Production (kt CO ₂)	4-78
Table 4-67: Phosphate Rock Domestic Consumption, Exports, and Imports (kt)	4-79
Table 4-68: Chemical Composition of Phosphate Rock (Percent by Weight)	4-79
Table 4-69: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Phosphoric Acid Product (MMT CO ₂ Eq. and Percent)	
Table 4-70: CO ₂ Emissions from Metallurgical Coke Production (MMT CO ₂ Eq.)	4-83
Table 4-71: CO ₂ Emissions from Metallurgical Coke Production (kt CO ₂)	4-83

Table 4-72: CO ₂ Emissions from Iron and Steel Production (MMT CO ₂ Eq.)	4-83
Table 4-73: CO ₂ Emissions from Iron and Steel Production (kt)	4-84
Table 4-74: CH ₄ Emissions from Iron and Steel Production (MMT CO ₂ Eq.)	4-84
Table 4-75: CH ₄ Emissions from Iron and Steel Production (kt)	4-84
Table 4-76: Material Carbon Contents for Metallurgical Coke Production	4-86
Table 4-77: Production and Consumption Data for the Calculation of CO ₂ Emissions from Metallurgical Coke Production (Thousand Metric Tons)	4-87
Table 4-78: Production and Consumption Data for the Calculation of CO_2 Emissions from Metallurgical Coke Production (Million $\mathrm{ft^3}$)	4-87
Table 4-79: Material Carbon Contents for Iron and Steel Production	4-87
Table 4-80: CH ₄ Emission Factors for Sinter and Pig Iron Production	4-88
Table 4-81: CO ₂ Emission Factors for Sinter Production, Direct Reduced Iron Production, and Pellet Productio	n 4-89
Table 4-82: Production and Consumption Data for the Calculation of CO ₂ and CH ₄ Emissions from Iron and Sto Production (Thousand Metric Tons)	
Table 4-83: Production and Consumption Data for the Calculation of CO ₂ Emissions from Iron and Steel Produ (Million ft ³ unless otherwise specified)	
Table 4-84: Approach 2 Quantitative Uncertainty Estimates for CO ₂ and CH ₄ Emissions from Iron and Steel Production and Metallurgical Coke Production (MMT CO ₂ Eq. and Percent)	4-92
Table 4-85: CO ₂ and CH ₄ Emissions from Ferroalloy Production (MMT CO ₂ Eq.)	4-94
Table 4-86: CO ₂ and CH ₄ Emissions from Ferroalloy Production (kt)	4-94
Table 4-87: Production of Ferroalloys (Metric Tons)	4-96
Table 4-88: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Ferroalloy Production (MI CO ₂ Eq. and Percent)	
Table 4-89: CO ₂ Emissions from Aluminum Production (MMT CO ₂ Eq.)	4-98
Table 4-90: CO ₂ Emissions from Aluminum Production (kt CO ₂)	4-99
Table 4-91: PFC Emissions from Aluminum Production (MMT CO ₂ Eq.)	4-99
Table 4-92: PFC Emissions from Aluminum Production (kt)	4-99
Table 4-93: Summary of HVAE Emissions	4-102
Table 4-94: Summary of LVAE Emissions	4-103
Table 4-95: Production of Primary Aluminum (kt)	4-103
Table 4-96: Approach 2 Quantitative Uncertainty Estimates for CO ₂ and PFC Emissions from Aluminum Produ (MMT CO ₂ Eq. and Percent)	
Table 4-97: SF ₆ , HFC-134a, FK 5-1-12 and CO₂ Emissions from Magnesium Production and Processing (MMT C Eq.)	
Table 4-98: SF ₆ , HFC-134a, FK 5-1-12 and CO ₂ Emissions from Magnesium Production and Processing (kt)	4-106
Table 4-99: SF ₆ Emission Factors (kg SF ₆ per metric ton of magnesium)	4-108
Table 4-100: Approach 2 Quantitative Uncertainty Estimates for SF ₆ , HFC-134a and CO ₂ Emissions from	<i>1</i> ₋110

Table 4-101: CO ₂ Emissions from Lead Production (MMT CO ₂ Eq.)	4-112
Table 4-102: CO ₂ Emissions from Lead Production (kt CO ₂)	4-112
Table 4-103: Lead Production (Metric Tons)	4-113
Table 4-104: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Lead Production (MMT (Eq. and Percent)	
Table 4-105: CO ₂ Emissions from Zinc Production (MMT CO ₂ Eq.)	4-116
Table 4-106: CO ₂ Emissions from Zinc Production (kt CO ₂)	4-116
Table 4-107: Zinc Production (Metric Tons)	4-116
Table 4-108: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Zinc Production (MMT Cand Percent)	-
Table 4-109: PFC, HFC, SF ₆ , NF ₃ , and N ₂ O Emissions from Electronics Industry (MMT CO ₂ Eq.)	4-123
Table 4-110: PFC, HFC, SF ₆ , NF ₃ , and N ₂ O Emissions from Semiconductor Manufacture (Metric Tons)	4-124
Table 4-111: F-HTF Emissions from Electronics Manufacture by Compound Group (kt CO ₂ Eq.)	4-124
Table 4-112: Approach 2 Quantitative Uncertainty Estimates for HFC, PFC, SF ₆ , NF ₃ and N ₂ O Emissions from Electronics Manufacture (MMT CO ₂ Eq. and Percent)	4-137
Table 4-113: Emissions of HFCs, PFCs, and CO ₂ from ODS Substitutes (MMT CO ₂ Eq.)	4-140
Table 4-114: Emissions of HFCs, PFCs, and CO ₂ from ODS Substitution (Metric Tons)	4-140
Table 4-115: Emissions of HFCs, PFCs, and CO ₂ from ODS Substitutes (MMT CO ₂ Eq.) by Sector	4-141
Table 4-116: Approach 2 Quantitative Uncertainty Estimates for HFC and PFC Emissions from ODS Substitute (MMT CO ₂ Eq. and Percent)	s . 4-144
Table 4-117: SF ₆ and CF ₄ Emissions from Electric Power Systems and Electrical Equipment Manufacturers (MI CO ₂ Eq.)	
Table 4-118: SF ₆ and CF ₄ Emissions from Electric Power Systems and Electrical Equipment Manufacturers (kt)	4-150
Table 4-119: GHGRP-only Average Emission Rate (kg per mile)	4-153
Table 4-120: Categorization of Utilities and Timeseries for Application of Corresponding Emission Estimation Methodologies	. 4-153
Table 4-121: Approach 2 Quantitative Uncertainty Estimates for SF ₆ and CF ₄ Emissions from Electrical Transmand Distribution (MMT CO ₂ Eq. and Percent)	
Table 4-122: N ₂ O Production (kt)	4-161
Table 4-123: N ₂ O Emissions from N ₂ O Product Usage (MMT CO ₂ Eq.)	4-161
Table 4-124: N ₂ O Emissions from N ₂ O Product Usage (kt N ₂ O)	4-161
Table 4-125: Approach 2 Quantitative Uncertainty Estimates for N ₂ O Emissions from N ₂ O Product Usage (MN CO ₂ Eq. and Percent)	
Table 4-126: NO _x , CO, NMVOC, and SO ₂ Emissions from Industrial Processes and Product Use (kt)	4-164
Table 5-1: Emissions from Agriculture (MMT CO ₂ Eq.)	5-3
Table 5-2: Emissions from Agriculture (kt)	5-3
Table 5-3: CH ₄ Emissions from Enteric Fermentation (MMT CO ₂ Eq.)	5-5
Table 5-4: CH ₄ Emissions from Enteric Fermentation (kt CH ₄)	5-5

Table 5-5: Cattle Sub-Population Categories for 2021 Population Estimates	5-8
Table 5-6: Approach 2 Quantitative Uncertainty Estimates for CH ₄ Emissions from Enteric Fermentation (MM ² Eq. and Percent)	
Table 5-7: CH ₄ and N ₂ O Emissions from Manure Management (MMT CO ₂ Eq.)	5-14
Table 5-8: CH ₄ and N ₂ O Emissions from Manure Management (kt)	5-14
Table 5-9: Approach 2 Quantitative Uncertainty Estimates for CH_4 and N_2O (Direct and Indirect) Emissions fro Manure Management (MMT CO_2 Eq. and Percent)	
Table 5-10: IPCC (2006) Implied Emission Factor Default Values Compared with Calculated Values for CH ₄ from Management (kg/head/year)	
Table 5-11: CH ₄ Emissions from Rice Cultivation (MMT CO ₂ Eq.)	5-22
Table 5-12: CH ₄ Emissions from Rice Cultivation (kt)	5-23
Table 5-13: Rice Area Harvested (1,000 Hectares)	5-25
Table 5-14: Average Ratooned Area as Percent of Primary Growth Area (Percent)	5-26
Table 5-15: Approach 2 Quantitative Uncertainty Estimates for CH ₄ Emissions from Rice Cultivation (MMT CO and Percent)	
Table 5-16: N ₂ O Emissions from Agricultural Soils (MMT CO ₂ Eq.)	5-31
Table 5-17: N₂O Emissions from Agricultural Soils (kt)	5-31
Table 5-18: Direct N ₂ O Emissions from Agricultural Soils by Land Use Type and N Input Type (MMT CO ₂ Eq.)	5-31
Table 5-19: Indirect N ₂ O Emissions from Agricultural Soils (MMT CO ₂ Eq.)	5-32
Table 5-20: Quantitative Uncertainty Estimates of N ₂ O Emissions from Agricultural Soil Management in 2021 (MMT CO ₂ Eq. and Percent)	
Table 5-21: Emissions from Liming (MMT CO ₂ Eq.)	5-48
Table 5-22: Emissions from Liming (MMT C)	5-48
Table 5-23: Applied Minerals (MMT)	5-50
Table 5-24: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Emissions from Liming (MMT CO ₂ Eq. and Percent)	
Table 5-25: CO ₂ Emissions from Urea Fertilization (MMT CO ₂ Eq.)	5-51
Table 5-26: CO ₂ Emissions from Urea Fertilization (MMT C)	5-51
Table 5-27: Applied Urea (MMT)	5-52
Table 5-28: Quantitative Uncertainty Estimates for CO ₂ Emissions from Urea Fertilization (MMT CO ₂ Eq. and Percent)	5-52
Table 5-29: CH ₄ and N ₂ O Emissions from Field Burning of Agricultural Residues (MMT CO ₂ Eq.)	5-54
Table 5-30: CH ₄ , N ₂ O, CO, and NO _x Emissions from Field Burning of Agricultural Residues (kt)	5-55
Table 5-31: Agricultural Crop Production (kt of Product)	5-58
Table 5-32: U.S. Average Percent Crop Area Burned by Crop (Percent)	5-59
Table 5-33: Parameters for Estimating Emissions from Field Burning of Agricultural Residues	5-60
Table 5-34: Greenhouse Gas Emission Ratios and Conversion Factors	5-61

Table 5-35: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and N ₂ O Emissions from Field Burning of Agricultural Residues (MMT CO ₂ Eq. and Percent)
Table 6-1: Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO ₂ Eq.) 6-4
Table 6-2: Emissions and Removals from Land Use, Land-Use Change, and Forestry by Gas (MMT CO ₂ Eq.) 6-6
Table 6-3: Emissions and Removals from Land Use, Land-Use Change, and Forestry by Gas (kt)
Table 6-4: Managed and Unmanaged Land Area by Land-Use Categories for All 50 States (Thousands of Hectares)
Table 6-5: Land Use and Land-Use Change for the U.S. Managed Land Base for All 50 States (Thousands of Hectares)
Table 6-6: Data Sources Used to Determine Land Use and Land Area for the Conterminous United States, Hawaii, and Alaska
Table 6-7: Total Land Area (Hectares) by Land Use Category for U.S. Territories 6-24
Table 6-8: Net CO ₂ Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT CO ₂ Eq.)
Table 6-9: Net C Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)
Table 6-10: Forest Area (1,000 ha) and C Stocks in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)
Table 6-11: Estimates of CO ₂ (MMT per Year) Emissions ^a from Forest Fires in the Conterminous 48 States and Alaska
Table 6-12: Quantitative Uncertainty Estimates for Net CO ₂ Flux from Forest Land Remaining Forest Land: Changes in Forest C Stocks (MMT CO ₂ Eq. and Percent)
Table 6-13: Recalculations of Forest Area (1,000 ha) and C Stocks in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)
Table 6-14: Recalculations of Net C Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)
Table 6-15: Non-CO ₂ Emissions from Forest Fires (MMT CO ₂ Eq.) ^a
Table 6-16: Non-CO ₂ Emissions from Forest Fires (kt) ^a
Table 6-17: Quantitative Uncertainty Estimates of Non-CO ₂ Emissions from Forest Fires (MMT CO ₂ Eq. and Percent) ^a
Table 6-18: N ₂ O Fluxes from Soils in Forest Land Remaining Forest Land and Land Converted to Forest Land (MMT CO ₂ Eq. and kt N ₂ O)
Table 6-19: Quantitative Uncertainty Estimates of N ₂ O Fluxes from Soils in Forest Land Remaining Forest Land and Land Converted to Forest Land (MMT CO ₂ Eq. and Percent)
Table 6-20: Non-CO ₂ Emissions from Drained Organic Forest Soils ^{a,b} (MMT CO ₂ Eq.)
Table 6-21: Non-CO ₂ Emissions from Drained Organic Forest Soils ^{a,b} (kt)
Table 6-22: States identified as having Drained Organic Soils, Area of Forest on Drained Organic Soils, and Sampling Error
Table 6-23: Quantitative Uncertainty Estimates for Non-CO ₂ Emissions on Drained Organic Forest Soils (MMT CO ₂ Eq. and Percent) ^a

Table 6-24: Net CO ₂ Flux from Forest C Pools in Land Converted to Forest Land by Land Use Change Category (MMT CO ₂ Eq.)
Table 6-25: Net C Flux from Forest C Pools in Land Converted to Forest Land by Land Use Change Category (MMT C)
Table 6-26: Quantitative Uncertainty Estimates for Forest C Pool Stock Changes (MMT CO ₂ Eq. per Year) in 2021 from Land Converted to Forest Land by Land Use Change
Table 6-27: Recalculations of the Net C Flux from Forest C Pools in Land Converted to Forest Land by Land Use Change Category (MMT C)
Table 6-28: Net CO ₂ Flux from Soil C Stock Changes in Cropland Remaining Cropland (MMT CO ₂ Eq.) 6-58
Table 6-29: Net CO ₂ Flux from Soil C Stock Changes in Cropland Remaining Cropland (MMT C) 6-58
Table 6-30: Approach 2 Quantitative Uncertainty Estimates for Soil C Stock Changes occurring within Cropland Remaining Cropland (MMT CO ₂ Eq. and Percent)
Table 6-31: Comparison of Managed Land Area in Cropland Remaining Cropland and Area in the Current Cropland Remaining Cropland Inventory (Thousand Hectares)
Table 6-32: Net CO ₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Land Converted to Cropland by Land Use Change Category (MMT CO ₂ Eq.)
Table 6-33: Net CO ₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Land Converted to Cropland (MMT C)
Table 6-34: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Cropland (MMT CO ₂ Eq. and Percent)
Table 6-35: Comparison of Managed Land Area in Land Converted to Cropland and the Area in the current Land Converted to Cropland Inventory (Thousand Hectares)
Table 6-36: Net CO ₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Grassland Remaining Grassland (MMT CO ₂ Eq.)
Table 6-37: Net CO ₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Grassland Remaining Grassland (MMT C)
Table 6-38: Approach 2 Quantitative Uncertainty Estimates for C Stock Changes Occurring Within Grassland Remaining Grassland (MMT CO ₂ Eq. and Percent)
Table 6-39: Comparison of Managed Land Area in Grassland Remaining Grassland and the Area in the current Grassland Remaining Grassland Inventory (Thousand Hectares)
Table 6-40: CH ₄ and N ₂ O Emissions from Biomass Burning in Grassland (MMT CO ₂ Eq.)
Table 6-41: CH ₄ , N ₂ O, CO, and NO _x Emissions from Biomass Burning in Grassland (kt)
Table 6-42: Thousands of Grassland Hectares Burned Annually
Table 6-43: Uncertainty Estimates for Non-CO ₂ Greenhouse Gas Emissions from Biomass Burning in Grassland (MMT CO ₂ Eq. and Percent)
Table 6-44: Net CO ₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Grassland (MMT CO ₂ Eq.)
Table 6-45: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Grassland (MMT C)
Table 6-46: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Grassland (MMT CO ₂ Eq. and Percent)

Table 6-47: Comparison of Managed Land Area in Land Converted to Grassland and Area in the current Land Converted to Grassland Inventory (Thousand Hectares)
Table 6-48: Emissions from Peatlands Remaining Peatlands (MMT CO ₂ Eq.)
Table 6-49: Emissions from Peatlands Remaining Peatlands (kt)
Table 6-50: Peat Production of Conterminous 48 States (kt)
Table 6-51: Peat Production of Alaska (Thousand Cubic Meters)
Table 6-52: Peat Production Area of Conterminous 48 States (Hectares)
Table 6-53: Peat Production Area of Alaska (Hectares)
Table 6-54: Peat Production (Hectares)
Table 6-55: Approach 2 Quantitative Uncertainty Estimates for CO₂, CH₄, and N₂O Emissions from Peatlands Remaining Peatlands (MMT CO₂ Eq. and Percent)
Table 6-56: Emissions and Removals from Coastal Wetlands Remaining Coastal Wetlands (MMT CO ₂ Eq.) 6-105
Table 6-57: Net CO ₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT CO ₂ Eq.)
Table 6-58: Net CO ₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT C)
Table 6-59: CH ₄ Emissions from Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT CO ₂ Eq. and kt CH ₄)
Table 6-60: Area of Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands, Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands, and Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (ha)
Table 6-61: Aboveground Biomass Carbon Stocks for Vegetated Coastal Wetlands (t C ha ⁻¹)
Table 6-62: Root to Shoot Ratios for Vegetated Coastal Wetlands
Table 6-63: Annual Soil Carbon Accumulation Rates for Vegetated Coastal Wetlands (t C ha ⁻¹ yr ⁻¹) 6-109
Table 6-64: IPCC Approach 1 Quantitative Uncertainty Estimates for C Stock Changes and CH ₄ Emissions occurring within Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands in 2021 (MMT CO ₂ Eq. and Percent) 6-110
Table 6-65: Net CO ₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands (MMT CO ₂ Eq.)
Table 6-66: Net CO ₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands (MMT C)
Table 6-67: Approach 1 Quantitative Uncertainty Estimates for CO ₂ Flux Occurring within Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands in 2020 (MMT CO ₂ Eq. and Percent) 6-114
Table 6-68: CO ₂ Flux from C Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (MMT CO ₂ Eq.)
Table 6-69: CO ₂ Flux from C Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (MMT C)
Table 6-70: Approach 1 Quantitative Uncertainty Estimates for C Stock Changes Occurring within Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands in 2021 (MMT CO₂ Eq. and Percent) 6-118
Table 6-71: N ₂ O Emissions from Aquaculture in Coastal Wetlands (MMT CO ₂ Eq. and kt N ₂ O)

Table 6-72: Approach 1 Quantitative Uncertainty Estimates for N ₂ O Emissions from Aquaculture Production in Coastal Wetlands in 2021 (MMT CO ₂ Eq. and Percent)	120
Table 6-73: CH ₄ Emissions from Flooded Land Remaining Flooded Land—Reservoirs (MMT CO ₂ Eq.) 6-	123
Table 6-74: CH ₄ Emissions from Flooded Land Remaining Flooded Land—Reservoirs (kt CH ₄)6-	123
Table 6-75: Surface and Downstream CH ₄ Emissions from Reservoirs in Flooded Land Remaining Flooded Land in 2021 (kt CH ₄)	
Table 6-76: IPCC (2019) Default CH ₄ Emission Factors for Surface Emission from Reservoirs in Flooded Land Remaining Flooded Land6-	125
Table 6-77: National Totals of Reservoir Surface Area in Flooded Land Remaining Flooded Land (millions of ha) . 126	6-
Table 6-78: State Breakdown of Reservoir Surface Area in Flooded Land Remaining Flooded Land (millions of ha 127) 6-
Table 6-79: Approach 2 Quantitative Uncertainty Estimates for CH ₄ Emissions from Reservoirs in Flooded Land Remaining Flooded Land	128
Table 6-80: CH ₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land (MM CO ₂ Eq.)6-	
Table 6-81: CH ₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land (kt Cl	
Table 6-82: CH ₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land in 20 (kt CH ₄)	
Table 6-83: IPCC (2019) Default CH ₄ Emission Factors for Surface Emissions from Other Constructed Waterbodie Flooded Land Remaining Flooded Land6-	
Table 6-84: Predictors used in Decision Tree to Identify Canal/Ditches	133
Table 6-85: Validation Results for Ditch/Canal Classification Decision Tree	134
Table 6-86: National Surface Area Totals in Flooded Land Remaining Flooded Land - Other Constructed Waterbodies (ha)	135
Table 6-87: State Totals of Surface Area in Flooded Land Remaining Flooded Land — Canals and Ditches (ha) . 6-	135
Table 6-88: State Totals of Surface Area in Flooded Land Remaining Flooded Land — Freshwater Ponds (ha) 6-	136
Table 6-89: Approach 2 Quantitative Uncertainty Estimates for CH ₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land	.137
Table 6-90: Net CO ₂ Flux from C Stock Changes in Land Converted to Vegetated Coastal Wetlands (MMT CO ₂ Eq 140	_l .) 6-
Table 6-91: Net CO ₂ Flux from C Stock Changes in Land Converted to Vegetated Coastal Wetlands (MMT C) 6-	140
Table 6-92: CH ₄ Emissions from Land Converted to Vegetated Coastal Wetlands (MMT CO ₂ Eq. and kt CH ₄) 6-	141
Table 6-93: Approach 1 Quantitative Uncertainty Estimates for C Stock Changes occurring within Land Converted	
to Vegetated Coastal Wetlands in 2021 (MMT CO ₂ Eq. and Percent)	
to Vegetated Coastal Wetlands in 2021 (MMT CO ₂ Eq. and Percent)	144
	·144 ·146
Table 6-94: CH ₄ Emissions from Land Converted to Flooded Land - Reservoirs (MMT CO ₂ Eq.) 6-	·144 ·146 ·146

Table 6-98: Methane and CO ₂ Emissions from Reservoirs in Land Converted to Flooded Land in 2021 (kt CH ₄ ; kt CO ₂)
Table 6-99: IPCC (2019) Default CH ₄ and CO ₂ Emission Factors for Surface Emissions from Reservoirs in Land Converted to Flooded Land
Table 6-100: National Totals of Reservoir Surface Area in Land Converted to Flooded Land (thousands of ha) 6-150
Table 6-101: State Breakdown of Reservoir Surface Area in Land Converted to Flooded Land (thousands of ha) \dots 6-151
Table 6-102: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and CO ₂ Emissions from Reservoirs in Land Converted to Flooded Land
Table 6-103: CH ₄ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT CO ₂ Eq.)6-154
Table 6-104: CH ₄ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (kt CH ₄) 6-154
Table 6-105: CO_2 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT CO_2) 6-154
Table 6-106: CO_2 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT C) 6-154
Table 6-107: CH ₄ and CO ₂ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land in 2021 (MT CO ₂ Eq.)
Table 6-108: IPCC Default Methane and CO ₂ Emission Factors for Other Constructed Waterbodies in Land Converted to Flooded Land
Table 6-109: National Surface Area Totals of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)6-157
Table 6-110: State Surface Area Totals of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)
Table 6-111: Approach 2 Quantitative Uncertainty Estimates for CH ₄ and CO ₂ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land
Table 6-112: Net CO ₂ Flux from Soil C Stock Changes in Settlements Remaining Settlements (MMT CO ₂ Eq.) 6-161
Table 6-113: Net CO ₂ Flux from Soil C Stock Changes in Settlements Remaining Settlements (MMT C) 6-162
Table 6-114: Thousands of Hectares of Drained Organic Soils in Settlements Remaining Settlements 6-162
Table 6-115: Uncertainty Estimates for CO ₂ Emissions from Drained Organic Soils in Settlements Remaining Settlements (MMT CO ₂ Eq. and Percent)
Table 6-116: Area of Managed Land in Settlements Remaining Settlements that is not included in the current Inventory (Thousand Hectares)
Table 6-117: Net Flux from Trees in Settlements Remaining Settlements (MMT CO ₂ Eq. and MMT C) ^a 6-165
Table 6-118: Carbon Storage (kg C/m² tree cover), Gross and Net Sequestration (kg C/m² tree cover/year) and Tree Cover (percent) among Sampled U.S. Cities (see Nowak et al. 2013)
Table 6-119: Estimated Annual C Sequestration, Tree Cover, and Annual C Sequestration per Area of Tree Cover for settlement areas in the United States by State and the District of Columbia (2021)
Table 6-120: Approach 2 Quantitative Uncertainty Estimates for Net CO ₂ Flux from Changes in C Stocks in Settlement Trees (MMT CO ₂ Eq. and Percent)
Table 6-121: Recalculations of the Settlement Tree Categories

Table 6-122: N ₂ O Emissions from Soils in Settlements Remaining Settlements (MMT CO ₂ Eq. and kt N ₂ O) 6	5-173
Table 6-123: Quantitative Uncertainty Estimates of N ₂ O Emissions from Soils in Settlements Remaining Settlements (MMT CO ₂ Eq. and Percent)6	5-174
Table 6-124: Net Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (MMT CO_2 Eq.) 6	5-176
Table 6-125: Net Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (MMT C)	5-176
Table 6-126: Moisture Contents, C Storage Factors (Proportions of Initial C Sequestered), Initial C Contents, an Decay Rates for Yard Trimmings and Food Scraps in Landfills	
Table 6-127: C Stocks in Yard Trimmings and Food Scraps in Landfills (MMT C)6	5-180
Table 6-128: Approach 2 Quantitative Uncertainty Estimates for CO ₂ Flux from Yard Trimmings and Food Scrap Landfills (MMT CO ₂ Eq. and Percent)	
Table 6-129: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Settlements (MMT CO_2 Eq.)	
Table 6-130: Net CO ₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Settlements (MMT C)	
Table 6-131: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stoc Changes occurring within Land Converted to Settlements (MMT CO_2 Eq. and Percent)	
Table 6-132: Area of Managed Land in Land Converted to Settlements that is not included in the current Invent (Thousand Hectares)6	-
Table 7-1: Emissions from Waste (MMT CO ₂ Eq.)	7-2
Table 7-2: Emissions from Waste (kt)	7-2
Table 7-3: CH ₄ Emissions from Landfills (MMT CO ₂ Eq.)	7-7
Table 7-4: CH ₄ Emissions from Landfills (kt CH ₄)	7-7
Table 7-5: Approach 2 Quantitative Uncertainty Estimates for CH ₄ Emissions from Landfills (MMT CO ₂ Eq. and Percent)	7-15
Table 7-6: Materials Discarded in the Municipal Waste Stream by Waste Type from 1990 to 2018 (Percent)	7-20
Table 7-7: CH ₄ and N ₂ O Emissions from Domestic and Industrial Wastewater Treatment (MMT CO ₂ Eq.)	7-24
Table 7-8: CH₄ and N₂O Emissions from Domestic and Industrial Wastewater Treatment (kt)	7-24
Table 7-9: Domestic Wastewater CH4 Emissions from Septic and Centralized Systems (2021, kt, MMT CO2 Eq. al Percent)	
Table 7-10: Variables and Data Sources for CH ₄ Emissions from Septic Systems	7-26
Table 7-11: Variables and Data Sources for Organics in Domestic Wastewater	. 7-27
Table 7-12: U.S. Population (Millions) and Domestic Wastewater TOW (kt)	. 7-28
Table 7-13: Variables and Data Sources for Organics in Centralized Domestic Wastewater	7-29
Table 7-14: Variables and Data Sources for CH ₄ Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands)	
Table 7-15: Variables and Data Sources for CH4 Emissions from Centrally Treated Aerobic Systems (Constructe Wetlands)	
Table 7-16: Variables and Data Sources for CH ₄ Emissions from Centrally Treated Anaerobic Systems	7-32
Table 7-17: Variables and Data Sources for Emissions from Anaerobic Sludge Digesters	. 7-32

Table 7-18: Variables and Data Sources for CH ₄ Emissions from Centrally Treated Systems Discharge	7-33
Table 7-19: Total Industrial Wastewater CH ₄ Emissions by Sector (2021, MMT CO ₂ Eq. and Percent)	7-35
Table 7-20: U.S. Pulp and Paper, Meat, Poultry, Vegetables, Fruits and Juices, Ethanol, Breweries, and Petrole Refining Production (MMT)	
Table 7-21: U.S. Industrial Wastewater Characteristics Data (2021)	7-37
Table 7-22: U.S. Industrial Wastewater Treatment Activity Data	7-38
Table 7-23: Sludge Variables for Aerobic Treatment Systems	7-38
Table 7-24: Fraction of TOW Removed During Treatment by Industry	7-39
Table 7-25: Wastewater Outflow (m³/ton) for Pulp, Paper, and Paperboard Mills	7-40
Table 7-26: Wastewater Outflow (m³/ton) and BOD Production (g/L) for U.S. Vegetables, Fruits, and Juices Production	7-41
Table 7-27: Domestic Wastewater N ₂ O Emissions from Septic and Centralized Systems (2021, kt, MMT CO ₂ Ed. Percent)	-
Table 7-28: Variables and Data Sources for Protein Consumed	7-44
Table 7-29: Variables and Data Sources for N₂O Emissions from Septic System	7-45
Table 7-30: Variables and Data Sources for Non-Consumed Protein and Nitrogen Entering Centralized System	ıs 7-46
Table 7-31: Variables and Data Sources for N₂O Emissions from Centrally Treated Aerobic Systems (Other that Constructed Wetlands)	
Table 7-32: Variables and Data Sources for N₂O Emissions from Centrally Treated Aerobic Systems (Construct Wetlands)	
Table 7-33: Variables and Data Sources for N ₂ O Emissions from Centrally Treated Anaerobic Systems	7-49
Table 7-34: U.S. Population (Millions) Fraction of Population Served by Centralized Wastewater Treatment (percent), Protein Supply (kg/person-year), and Protein Consumed (kg/person-year)	7-49
Table 7-35: Variables and Data Sources for N ₂ O Emissions from Centrally Treated Systems Discharge	7-50
Table 7-36: Total Industrial Wastewater N ₂ O Emissions by Sector (2021, MMT CO ₂ Eq. and Percent)	7-51
Table 7-37: U.S. Industrial Wastewater Nitrogen Data	7-52
Table 7-38: Industrial Wastewater Nitrogen Discharged in 2018 by Sector (kg N)	7-53
Table 7-39: Approach 2 Quantitative Uncertainty Estimates for 2021 Emissions from Wastewater Treatment CO ₂ Eq. and Percent)	
Table 7-40: CH ₄ and N ₂ O Emissions from Composting (MMT CO ₂ Eq.)	7-58
Table 7-41: CH ₄ and N ₂ O Emissions from Composting (kt)	7-58
Table 7-42: U.S. Waste Composted (kt)	7-59
Table 7-43: Tier 1 Quantitative Uncertainty Estimates for Emissions from Composting (MMT CO ₂ Eq. and Pero	,
Table 7-44: CH ₄ Emissions from Anaerobic Digestion at Biogas Facilities (MMT CO ₂ Eq.)	7-62
Table 7-45: CH ₄ Emissions from Anaerobic Digestion at Biogas Facilities (kt CH ₄)	7-62
Table 7-46: U.S. Waste Digested (kt) from 1990-2021	7-65
Table 7-47: Estimated Number of Stand-Alone AD Facilities Operating from 1990-2021	7-6 ⁻

Table 7-48: Estimated Biogas Produced and Methane Recovered from Anaerobic Digestion at Biogas Facilities Operating from 1990-2021 ^a	. 7-65
Table 7-49: Approach 1 Quantitative Uncertainty Estimates for Emissions from Anaerobic Digestion (MMT CO ₂ and Percent)	
Table 7-50: Emissions of NO _x , CO, NMVOC, and SO ₂ from Waste (kt)	. 7-68
Table 9-1: Revisions to the U.S. Greenhouse Gas Emissions, Including Quantitative Change Related to the Use of AR5 GWP Values (MMT CO ₂ Eq.)	
Table 9-2: Revisions to U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Cha and Forestry, Including Quantitative Change Related to the Use of AR5 GWP Values (MMT CO_2 Eq.)	-
Table 9-3: Revisions to U.S. Greenhouse Gas Emissions, Excluding Quantitative Change Related to the Use of AGWP Values (MMT CO ₂ Eq.)	
Table 9-4: Revisions to U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Cha and Forestry, Excluding Quantitative Change Related to the Use of AR5 GWP Values (MMT CO ₂ Eq.)	•
Figures	
Figure ES-1: U.S. Greenhouse Gas Emissions and Sinks by Gas	ES-5
Figure ES-2: Annual Percent Change in Gross U.S. Greenhouse Gas Emissions and Sinks Relative to the Previous Year	
Figure ES-3: 2021 Total Gross U.S. Greenhouse Gas Emissions by Gas (Percentages based on MMT CO_2 Eq.)	ES-8
Figure ES-4: 2021 Sources of CO ₂ Emissions	ES-9
Figure ES-5: 2021 CO ₂ Emissions from Fossil Fuel Combustion by Sector and Fuel Type	ES-10
Figure ES-6: 2021 End-Use Sector Emissions of CO ₂ from Fossil Fuel Combustion	ES-10
Figure ES-7: Electric Power Generation and Emissions	ES-12
Figure ES-8: 2021 Sources of CH ₄ Emissions	ES-13
Figure ES-9: 2021 Sources of N ₂ O Emissions	ES-14
Figure ES-10: 2021 Sources of HFCs, PFCs, SF ₆ , and NF ₃ Emissions	ES-16
Figure ES-11: U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector	ES-17
Figure ES-12: 2021 U.S. Energy Consumption by Energy Source (Percent)	ES-18
Figure ES-13: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors	ES-22
Figure ES-14: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed to Economic Sector	
Figure ES-15: U.S. Greenhouse Gas Emissions Per Capita and Per Dollar of Gross Domestic Product (GDP)	ES-25
Figure ES-16: 2021 Key Categories (Approach 1 including LULUCF) ^a	ES-26
Figure 1-1: National Inventory Arrangements and Process Diagram	. 1-13
Figure 1-2: U.S. QA/QC Plan Summary	. 1-26
Figure 2-1: U.S. Greenhouse Gas Emissions and Sinks by Gas	2-2
Figure 2-2: Annual Percent Change in Gross U.S. Greenhouse Gas Emissions Relative to the Previous Year	2-2
Figure 2-3: 2021 Gross Total U.S. Greenhouse Gas Emissions by Gas (Percentages based on MMT CO ₂ Eq.)	2-3

Figure 2-4: U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector	2-9
Figure 2-5: Trends in Energy Sector Greenhouse Gas Sources	2-11
Figure 2-6: Trends in CO ₂ Emissions from Fossil Fuel Combustion by End-Use Sector and Fuel Type	2-15
Figure 2-7: Trends in End-Use Sector Emissions of CO ₂ from Fossil Fuel Combustion	2-16
Figure 2-8: Electric Power Generation (Billion kWh) and Emissions (MMT CO ₂ Eq.)	2-17
Figure 2-9: Trends in Industrial Processes and Product Use Sector Greenhouse Gas Sources	2-19
Figure 2-10: Trends in Agriculture Sector Greenhouse Gas Sources	2-21
Figure 2-11: Trends in Emissions and Removals (Net CO ₂ Flux) from Land Use, Land-Use Change, and Forestry	2-24
Figure 2-12: Trends in Waste Sector Greenhouse Gas Sources	2-27
Figure 2-13: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors	2-28
Figure 2-14: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed to Economic Sector 33	rs 2
Figure 2-15: Trends in Transportation-Related Greenhouse Gas Emissions	2-36
Figure 2-16: U.S. Greenhouse Gas Emissions Per Capita and Per Dollar of Gross Domestic Product	2-39
Figure 3-1: 2021 Energy Sector Greenhouse Gas Sources	3-2
Figure 3-2: Trends in Energy Sector Greenhouse Gas Sources	3-2
Figure 3-3: 2021 U.S. Fossil Carbon Flows	3-3
Figure 3-4: 2021 U.S. Energy Use by Energy Source	3-10
Figure 3-5: Annual U.S. Energy Use	3-11
Figure 3-6: 2021 CO ₂ Emissions from Fossil Fuel Combustion by Sector and Fuel Type	3-11
Figure 3-7: Annual Deviations from Normal Heating Degree Days for the United States (1970–2021, Index No 100)	
Figure 3-8: Annual Deviations from Normal Cooling Degree Days for the United States (1970–2021, Index Normal 100)	
Figure 3-9: Fuels Used in Electric Power Generation and Total Electric Power Sector CO ₂ Emissions	3-18
Figure 3-10: Electric Power Retail Sales by End-Use Sector	3-19
Figure 3-11: Industrial Production Indices (Index 2017=100)	3-20
Figure 3-12: Fuels and Electricity Used in Industrial Sector, Industrial Output, and Total Sector CO ₂ Emissions (Including Electricity)	3-21
Figure 3-13: Fuels and Electricity Used in Residential and Commercial Sectors, Heating and Cooling Degree Da and Total Sector CO ₂ Emissions (Including Electricity)	•
Figure 3-14: Fuels Used in Transportation Sector, On-road VMT, and Total Sector CO ₂ Emissions	3-24
Figure 3-15: Sales-Weighted Fuel Economy of New Passenger Cars and Light-Duty Trucks, 1990–2021	3-26
Figure 3-16: Sales of New Passenger Cars and Light-Duty Trucks, 1990–2021	3-26
Figure 3-17: Mobile Source CH ₄ and N ₂ O Emissions	3-29
Figure 3-18: U.S. Energy Consumption and Energy-Related CO ₂ Emissions Per Capita and Per Dollar GDP	3-36
Figure 4-1: 2021 Industrial Processes and Product Use Sector Greenhouse Gas Sources	4-7

Figure 4-2: Trends in Industrial Processes and Product Use Sector Greenhouse Gas Sources 4-
Figure 4-3: U.S. Emissions of SF ₆ Comparison ^a
Figure 5-1: 2021 Agriculture Sector Greenhouse Gas Emission Sources
Figure 5-2: Trends in Agriculture Sector Greenhouse Gas Emission Sources
Figure 5-3: Annual CH ₄ Emissions from Rice Cultivation, 2015
Figure 5-4: Sources and Pathways of N that Result in N ₂ O Emissions from Agricultural Soil Management 5-3
Figure 5-5: Croplands, 2020 Annual Direct N₂O Emissions Estimated Using the Tier 3 DayCent Model 5-3
Figure 5-6: Grasslands, 2020 Annual Direct N ₂ O Emissions Estimated Using the Tier 3 DayCent Model 5-3
Figure 5-7: Croplands, 2020 Annual Indirect N ₂ O Emissions from Volatilization Using the Tier 3 DayCent Model 5-3
Figure 5-8: Grasslands, 2020 Annual Indirect N_2O Emissions from Volatilization Using the Tier 3 DayCent Model 5 35
Figure 5-9: Croplands, 2020 Annual Indirect N ₂ O Emissions from Leaching and Runoff Using the Tier 3 DayCent Model
Figure 5-10: Grasslands, 2020 Annual Indirect N₂O Emissions from Leaching and Runoff Using the Tier 3 DayCent Model
Figure 6-1: 2021 LULUCF Chapter Greenhouse Gas Sources and Sinks
Figure 6-2: Trends in Emissions and Removals (Net CO ₂ Flux) from Land Use, Land-Use Change, and Forestry 6-
Figure 6-3: Percent of Total Land Area for Each State in the General Land Use Categories for 2021 6-1
Figure 6-4: Changes in Forest Area by Region for Forest Land Remaining Forest Land in the conterminous United States and Alaska (1990-2021)
Figure 6-5: Estimated Net Annual Changes in C Stocks for All C Pools in Forest Land Remaining Forest Land in the Conterminous United States and Alaska (1990-2021)
Figure 6-6: Total Net Annual Soil C Stock Changes for Mineral Soils under Agricultural Management within States, 2015, Cropland Remaining Cropland
Figure 6-7: Total Net Annual Soil C Stock Changes for Organic Soils under Agricultural Management within States, 2015, Cropland Remaining Cropland
Figure 6-8: Total Net Annual Soil C Stock Changes for Mineral Soils under Agricultural Management within States, 2015, Grassland Remaining Grassland
Figure 6-9: Total Net Annual Soil C Stock Changes for Organic Soils under Agricultural Management within States, 2015, Grassland Remaining Grassland
Figure 6-10: U.S. Reservoirs (black polygons) in the Flooded Land Remaining Flooded Land Category in 2021 6-12
Figure 6-11: Total CH ₄ Emissions (Downstream + Surface) from Reservoirs in Flooded Land Remaining Flooded Land in 2021 (kt CH ₄)
Figure 6-12: Selected Features from NWI that Meet Flooded Lands Criteria 6-12
Figure 6-13: 2021 CH ₄ Emissions from A) Ditches and Canals and B) Freshwater Ponds in Flooded Land Remaining Flooded Land (kt CH ₄)
Figure 6-14: Left: NWI Features Identified as Canals/Ditches (pink) by Unique Narrow, Linear/Angular Morphology Right: Non-Canal/Ditches with More Natural Morphology (blue)
Figure 6-15: Structure of Decision Tree Used to Identify Canals/Ditches 6-13

Figure 6-16: 2021 Surface Area of A) Ditches and Canals and B) Freshwater Ponds in Flooded Land Remaining Flooded Land (hectares)	
Figure 6-17: U.S. Reservoirs (black polygons) in the Land Converted to Flooded Land Category in 2021	6-146
Figure 6-18: 2021 A) CH ₄ and B) CO ₂ Emissions from U.S. Reservoirs in Land Converted to Flooded Land	6-147
Figure 6-19: Selected Features from NWI that meet Flooded Lands Criteria	6-150
Figure 6-20: Number of Dams Built per Year from 1990 through 2021	6-151
Figure 6-21: 2021 A) CH_4 and B) CO_2 Emissions from Other Constructed Waterbodies (Freshwater Ponds) in L Converted to Flooded Land (MT CO_2 Eq.)	
Figure 6-22: Surface Area of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)	6-158
Figure 7-1: 2021 Waste Sector Greenhouse Gas Sources	7-1
Figure 7-2: Trends in Waste Sector Greenhouse Gas Sources	7-2
Figure 7-3: Methodologies Used Across the Time Series to Compile the U.S. Inventory of Emission Estimates f MSW Landfills	
Figure 7-4: Management of Municipal Solid Waste in the United States, 2018	7-19
Figure 7-5: MSW Management Trends from 1990 to 2018	7-19
Figure 7-6: Percent of Degradable Materials Diverted from Landfills from 1990 to 2018 (Percent)	7-21
Figure 9-1: Impacts of Recalculations on Net Emissions	9-5
Figure 9-2: Impacts from Recalculations to U.S. Greenhouse Gas Emissions by Sector, Including Quantitative Change Related to the Use of AR5 GWP Values	
Boxes	
Box ES-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program	ES-2
Box ES-2: Trends in Various U.S. Greenhouse Gas Emissions-Related Data	ES-24
Box ES-3: Use of Ambient Measurements Systems for Validation of Emission Inventories	.ES-27
Box 1-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program	1-2
Box 1-2: The IPCC Sixth Assessment Report and Global Warming Potentials	1-10
Box 1-3: Examples of Verification Activities	1-27
Box 2-1: Methodology for Aggregating Emissions by Economic Sector	2-30
Box 2-2: Trends in Various U.S. Greenhouse Gas Emissions-Related Data	2-38
Box 3-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program	3-6
Box 3-2: Weather and Non-Fossil Energy Effects on CO ₂ Emissions from Fossil Fuel Combustion Trends	3-11
Box 3-3: Uses of Greenhouse Gas Reporting Program Data and Improvements in Reporting Emissions from	
Industrial Sector Fossil Fuel Combustion	
Box 3-4: Carbon Intensity of U.S. Energy Consumption	
Box 3-5: Reporting of Lubricants Waxes and Asphalt and Road Oil Product Use in Energy Sector	3-54

Box 3-6: Carbon Dioxide Transport, Injection, and Geological Storage	3-91
Box 4-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals	4-7
Box 4-2: Industrial Process and Product Use Data from EPA's Greenhouse Gas Reporting Program	4-9
Box 5-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals	5-4
Box 5-2: Surrogate Data Method	5-26
Box 5-3: Tier 1 vs. Tier 3 Approach for Estimating N₂O Emissions	5-37
Box 5-4: Data Splicing Method	5-39
Box 5-5: Comparison of the Tier 2 U.S. Inventory Approach and IPCC (2006) Default Approach	5-49
Box 5-6: Comparison of Tier 2 U.S. Inventory Approach and IPCC (2006) Default Approach	5-57
Box 6-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals	6-9
Box 6-2: Preliminary Estimates of Land Use in U.S. Territories	6-23
Box 6-3: CO ₂ Emissions from Forest Fires	6-32
Box 6-4: Surrogate Data Method	6-62
Box 6-5: Tier 3 Approach for Soil C Stocks Compared to Tier 1 or 2 Approaches	6-63
Box 7-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to Greenhouse Gas Reporting Data	7-3
Box 7-2: Description of a Modern, Managed Landfill in the United States	7-5
Box 7-3: Nationwide Municipal Solid Waste Data Sources	7-13
Box 7-4: Overview of U.S. Solid Waste Management Trends	7-18
Equations	
Equation 1-1: Calculating CO ₂ Equivalent Emissions	1-9
Equation 3-1: Estimating Fugitive CO ₂ Emissions from Underground Mines	3-67
Equation 3-2: Estimating CO ₂ Emissions from Drained Methane Flared or Catalytically Oxidized	3-68
Equation 3-3: Decline Function to Estimate Venting Abandoned Mine Methane Emissions	3-72
Equation 3-4: Decline Function to Estimate Flooded Abandoned Mine Methane Emissions	3-72
Equation 4-1: 2006 IPCC Guidelines Tier 1 Emission Factor for Clinker (precursor to Equation 2.4)	4-11
Equation 4-2: 2006 IPCC Guidelines Tier 2 Emission Factor for Lime Production, High-Calcium Lime (Equation 16	2.9) 4-
Equation 4-3: 2006 IPCC Guidelines Tier 2 Emission Factor for Lime Production, Dolomitic Lime (Equation 2.9)) 4-16
Equation 4-4: 2006 IPCC Guidelines Tier 3: N ₂ O Emissions From Nitric Acid Production (Equation 3.6)	4-40
Equation 4-5: 2006 IPCC Guidelines Tier 2: N₂O Emissions From Adipic Acid Production (Equation 3.8)	4-45
Equation 4-6: 2006 IPCC Guidelines Tier 1: N₂O Emissions From Caprolactam Production (Equation 3.9)	4-49
Equation 4-7: 2006 IPCC Guidelines Tier 1: Emissions from Carbide Production (Equation 3.11)	4-53
Equation 4-8: 2006 IPCC Guidelines Tier 1: CO ₂ Emissions from Titanium Production (Equation 3.12)	4-56
Equation 4-9: CO ₂ Emissions from Phosphoric Acid Production	4-78

Equation 4-10: CO ₂ Emissions from Coke, Pig Iron, EAF Steel, and BOF Steel Production, based on 2006 IPCC Guidelines Tier 2 Methodologies	4-84
Equation 4-11: 2006 IPCC Guidelines Tier 1: Emissions from Sinter, Direct Reduced Iron, and Pellet Production (Equations 4.6, 4.7, and 4.8)	
Equation 4-12: 2006 IPCC Guidelines Tier 1: CO ₂ Emissions for Ferroalloy Production (Equation 4.15)	4-95
Equation 4-13: 2006 IPCC Guidelines Tier 1: CH ₄ Emissions for Ferroalloy Production (Equation 4.18)	4-95
Equation 4-14: CF ₄ Emissions Resulting from Low Voltage Anode Effects	. 4-102
Equation 4-15: 2006 IPCC Guidelines Tier 1: CO ₂ Emissions From Lead Production (Equation 4.32)	. 4-112
Equation 4-16: 2006 IPCC Guidelines Tier 1: CO ₂ Emissions From Zinc Production (Equation 4.33)	. 4-117
Equation 4-17: Waelz Kiln CO ₂ Emission Factor for Zinc Produced	. 4-117
Equation 4-18: Waelz Kiln CO ₂ Emission Factor for EAF Dust Consumed	. 4-118
Equation 4-19: Total Emissions from Electronics Industry	. 4-133
Equation 4-20: Total Emissions from Semiconductor Manufacturing	. 4-134
Equation 4-21: Total Emissions from MEMS Manufacturing	. 4-136
Equation 4-22: Total Emissions from PV Manufacturing	. 4-136
Equation 4-23: Estimation for SF ₆ Emissions from Electric Power Systems	. 4-150
Equation 4-24: Regression Equation for Estimating SF ₆ Emissions of Non-Reporting Facilities in 1999	. 4-152
Equation 4-25: Regression Equation for Estimating SF ₆ Emissions of GHGRP-Only Reporters in 2011	. 4-153
Equation 4-26: N ₂ O Emissions from Product Use	. 4-161
Equation 5-1: Elemental C or N Released through Oxidation of Crop Residues	5-56
Equation 5-2: Emissions from Crop Residue Burning	5-57
Equation 5-3: Estimation of Greenhouse Gas Emissions from Fire	5-57
Equation 6-1: Net State Annual Carbon Sequestration	. 6-169
Equation 6-2: Total C Stock for Yard Trimmings and Food Scraps in Landfills	. 6-178
Equation 6-3: C Stock Annual Flux for Yard Trimmings and Food Scraps in Landfills	. 6-179
Equation 7-1: Landfill Methane Generation	7-8
Equation 7-2: Net Methane Emissions from MSW Landfills	7-8
Equation 7-3: Net Methane Emissions from Industrial Waste Landfills	7-12
Equation 7-4: Total Domestic CH ₄ Emissions from Wastewater Treatment and Discharge	7-26
Equation 7-5: CH ₄ Emissions from Septic Systems	7-26
Equation 7-6: Total Wastewater BOD5 Produced per Capita (U.SSpecific [ERG 2018a])	7-27
Equation 7-7: Total Organically Degradable Material in Domestic Wastewater (IPCC 2019 [Eq. 6.3])	7-27
Equation 7-8: Total Domestic CH ₄ Emissions from Centrally Treated Aerobic Systems	7-29
Equation 7-9: Total Organics in Centralized Wastewater Treatment [IPCC 2019 (Eq. 6.3A)]	7-29
Equation 7-10: Organic Component Removed from Aerobic Wastewater Treatment (IPCC 2019 [Eq. 6.3R])	7-20

Equation 7-11: Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands) (IPCC [Eq. 6.1])	
Equation 7-12: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only) [IPCC 2014 (
Equation 7-13: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment) (U.S. Specific)	7-31
Equation 7-14: Emissions from Centrally Treated Anaerobic Systems [IPCC 2019 (Eq. 6.on)]	7-32
Equation 7-15: Emissions from Anaerobic Sludge Digesters (U.S. Specific)	7-32
Equation 7-16: Emissions from Centrally Treated Systems Discharge (U.SSpecific)	7-33
Equation 7-17: Total Organics in Centralized Treatment Effluent (IPCC 2019 [Eq. 6.3D])	7-33
Equation 7-18: Total Organics in Effluent Discharged to Reservoirs, Lakes, or Estuaries (U.SSpecific)	7-33
Equation 7-19: Total Organics in Effluent Discharged to Other Waterbodies (U.SSpecific)	7-33
Equation 7-20: Total CH₄ Emissions from Industrial Wastewater	7-35
Equation 7-21: TOW in Industry Wastewater Treatment Systems	7-35
Equation 7-22: Organic Component Removed from Aerobic Wastewater Treatment – Pulp, Paper, and Pape	
Equation 7-23: Organic Component Removed from Aerobic Treatment Plants	7-36
Equation 7-24: Raw Sludge Removed from Wastewater Treatment as Dry Mass	7-36
Equation 7-25: CH ₄ Emissions from Industrial Wastewater Treatment Discharge	7-38
Equation 7-26: TOW in Industrial Wastewater Effluent	7-39
Equation 7-27: Emissions from Pulp and Paper Discharge (U.S. Specific)	7-40
Equation 7-28: Total Organics in Pulp and Paper Effluent Discharged to Reservoirs, Lakes, Or Estuaries (U.S.	7.40
Specific)	
Equation 7-29: Total Organics in Pulp and Paper Effluent Discharged to Other Waterbodies (U.S. Specific)	
Equation 7-30: Total Domestic N ₂ O Emissions from Wastewater Treatment and Discharge	
Equation 7-31: Annual per Capita Protein Supply (U.S. Specific)	
Equation 7-32: Consumed Protein [IPCC 2019 (Eq. 6.10A)]	
Equation 7-33: Total Nitrogen Entering Septic Systems (IPCC 2019 [Eq. 6.10])	
Equation 7-34: Emissions from Septic Systems (IPCC 2019 [Eq. 6.9])	
Equation 7-35: Total Nitrogen Entering Centralized Systems (IPCC 2019 [Eq. 10])	
Equation 7-36: Total Domestic N ₂ O Emissions from Centrally Treated Aerobic Systems	
Equation 7-37: Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands) (IPCC [Eq. 6.9])	
Equation 7-38: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only) (IPCC 2014 [6.9])	
Equation 7-39: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment) (U.SSpecific)	7-48
Equation 7-40: Emissions from Centrally Treated Anaerobic Systems (IPCC 2019 [Eq. 6.9])	7-49

Equation 7-41: Emissions from Centrally Treated Systems Discharge (U.SSpecific)	7-50
Equation 7-42: Total Organics in Centralized Treatment Effluent (IPCC 2019 [Eq. 6.8])	7-50
Equation 7-43: Total Nitrogen in Effluent Discharged to Impaired Waterbodies (U.SSpecific)	7-50
Equation 7-44: Total Nitrogen in Effluent Discharged to Nonimpaired Waterbodies (U.SSpecific)	7-50
Equation 7-45: Total Nitrogen in Industrial Wastewater	7-52
Equation 7-46: N ₂ O Emissions from Industrial Wastewater Treatment Plants	7-52
Equation 7-47: N ₂ O Emissions from Industrial Wastewater Treatment Effluent	7-53
Equation 7-48: Greenhouse Gas Emission Calculation for Composting	7-59
Equation 7-49: Methane Emissions Calculation for Anaerobic Digestion	7-63
Equation 7-50: Recovered Methane Estimation for Anaerobic Digestion	7-63
Equation 7-51: Weighted Average of Waste Processed	7-64

Executive Summary

An inventory that identifies and quantifies a country's anthropogenic 1 sources and sinks of greenhouse gas emissions and removals is essential for addressing climate change. This Inventory adheres to both (1) a comprehensive and detailed set of methodologies for estimating national sources and sinks of anthropogenic greenhouse gases, and (2) a common and consistent format that enables Parties to the United Nations Framework Convention on Climate Change (UNFCCC) to compare the relative contribution of different emission sources and greenhouse gases to climate change.

In 1992, the United States signed and ratified the UNFCCC. As stated in Article 2 of the UNFCCC, "The ultimate objective of this Convention and any related legal instruments that the Conference of the Parties may adopt is to achieve, in accordance with the relevant provisions of the Convention, stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a time-frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner."²

As a signatory to the UNFCCC, consistent with Article 4³ and decisions at the First, Second, Fifth, and Nineteenth Conference of Parties, 4 the United States is committed to submitting a national inventory of anthropogenic sources and sinks of greenhouse gases to the UNFCCC by April 15 of each year. The United States views this report, in conjunction with Common Reporting Format (CRF) reporting tables that accompany this report, as an opportunity to fulfill this annual commitment under the UNFCCC.

This executive summary provides the latest information on U.S. anthropogenic greenhouse gas emission trends from 1990 through 2021. The structure of this report is consistent with the UNFCCC guidelines for inventory reporting, as discussed in Box ES-1.5

¹ The term "anthropogenic," in this context, refers to greenhouse gas emissions and removals that are a direct result of human activities or are the result of natural processes that have been affected by human activities (IPCC 2006).

² Article 2 of the Framework Convention on Climate Change published by the UNEP/WMO Information Unit on Climate Change. See http://unfccc.int.

³ Article 4(1)(a) of the United Nations Framework Convention on Climate Change (also identified in Article 12) and subsequent decisions by the Conference of the Parties elaborated the role of Annex I Parties in preparing national inventories. Article 4 states "Parties to the Convention, by ratifying, shall develop, periodically update, publish and make available...national inventories of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol, using comparable methodologies..." See http://unfccc.int for more information.

⁴ See UNFCCC decisions 3/CP.1, 9/CP.2, 3/CP.5, and 24/CP.19 at https://unfccc.int/documents.

⁵ See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

Box ES-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program

In following the UNFCCC requirement under Article 4.1 and related decisions to develop and submit annual national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally accepted methods provided by the IPCC in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines) and where appropriate, its supplements and refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common manner in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable (UNFCCC 2014). The presentation of emissions and removals provided in this Inventory does not preclude alternative examinations, but rather this Inventory presents emissions and removals in a common format consistent with how countries are to report inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals.

EPA also collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP), which is complementary to the U.S. Inventory. The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject carbon dioxide (CO₂) underground for sequestration or other reasons and requires reporting by over 8,000 sources or suppliers in 41 industrial categories. Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases. In general, the threshold for reporting is 25,000 metric tons or more of CO₂ Eq. per year. Facilities in most source categories subject to GHGRP began reporting for the 2010 reporting year while additional types of industrial operations began reporting for reporting year 2011. Methodologies used in EPA's GHGRP are consistent with the 2006 IPCC Guidelines. While the GHGRP does not provide full coverage of total annual U.S. greenhouse gas emissions and sinks (e.g., the GHGRP excludes emissions from the agricultural, land use, and forestry sectors), it is an important input to the calculations of national-level emissions in this Inventory.

The GHGRP dataset provides not only annual emissions information, but also other annual information such as activity data and emission factors that can improve and refine national emission estimates over time. GHGRP data also allow EPA to disaggregate national inventory estimates in new ways that can highlight differences across regions and sub-categories of emissions, along with enhancing the application of QA/QC procedures and assessment of uncertainties. See Annex 9 for more information on specific uses of GHGRP data in the Inventory (e.g., use of Subpart W data in compiling estimates for natural gas systems).

ES.1 Background Information

Greenhouse gases absorb infrared radiation, trapping heat in the atmosphere and making the planet warmer. The most important greenhouse gases directly emitted by humans include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and several fluorine-containing halogenated substances (HFCs, PFCs, SF₆ and NF₃). Although CO_2 , CH_4 , and N_2O occur naturally in the atmosphere, human activities have changed their atmospheric

⁶ On October 30, 2009 the EPA promulgated a rule requiring annual reporting of greenhouse gas data from large greenhouse gas emissions sources in the United States. Implementation of the rule, codified at 40 CFR Part 98, is referred to as EPA's Greenhouse Gas Reporting Program (GHGRP).

⁷ See http://ghgdata.epa.gov/ghgp/main.do.

concentrations. From the pre-industrial era (i.e., ending about 1750) to 2021, concentrations of these greenhouse gases have increased globally by 48.1, 170.8, and 23.8 percent, respectively (IPCC 2013; NOAA/ESRL 2023a, 2023b, 2023c). This annual report estimates the total national greenhouse gas emissions and removals associated with human activities across the United States.

Global Warming Potentials

The IPCC developed the global warming potential (GWP) concept to compare the ability of a greenhouse gas to trap heat in the atmosphere relative to another gas. The GWP of a greenhouse gas is defined as the ratio of the accumulated radiative forcing within a specific time horizon caused by emitting 1 kilogram of the gas, relative to that of the reference gas CO_2 (IPCC 2013); therefore, CO_2 -equivalent emissions are provided in million metric tons of CO_2 equivalent (MMT CO_2 Eq.) for non- CO_2 greenhouse gases. ^{8,9} All estimates are provided throughout the main report in both CO_2 equivalents and unweighted units, while estimates for all gases in this Executive Summary are presented in units of MMT CO_2 Eq. Emissions by gas in unweighted mass kilotons are also provided in the Trends and sector chapters of this report and in the Common Reporting Format (CRF) tables that are included in the submission to the UNFCCC.

Recent decisions under the UNFCCC ¹⁰ require Parties to use 100-year GWP values from the IPCC *Fifth Assessment Report* (AR5) for calculating CO₂-equivalents in their national reporting (IPCC 2013) by the end of 2024. This reflects updated science and ensures that national greenhouse gas inventories reported by all nations are comparable. In preparation for upcoming UNFCCC requirements, ¹¹ this report reflects CO₂-equivalent greenhouse gas emission totals using 100-year AR5 GWP values. A comparison of emission values with the previously used 100-year GWP values from the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007), and the IPCC *Sixth Assessment Report* (AR6) (IPCC 2021) values can be found in Annex 6.1 of this report. The 100-year GWP values used in this report are listed below in Table ES-1.

Table ES-1: Global Warming Potentials (100-Year Time Horizon) Used in this Report

Gas	GWP
CO ₂	1
CH ₄ ^a	28
N ₂ O	265
HFCs	up to 12,400
PFCs	up to 11,100
SF ₆	23,500
NF ₃	16,100
Other Fluorinated Gases	See Annex 6

^a The GWP of CH₄ includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to production of CO₂ is not included. See Annex 6 for additional information. Source: IPCC (2013).

⁸ Carbon comprises 12/44 of carbon dioxide by weight.

⁹ One million metric ton is equal to 10¹² grams or one teragram.

¹⁰ See paragraphs 1 and 2 of the decision on common metrics adopted at the 27th UNFCCC Conference of Parties (COP27), available online at https://unfccc.int/sites/default/files/resource/cp2022 10a01 adv.pdf.

¹¹ See Annex to decision 18/CMA.1, available online at https://unfccc.int/sites/default/files/resource/CMA2018 03a02E.pdf.

ES.2 Recent Trends in U.S. Greenhouse Gas Emissions and Sinks

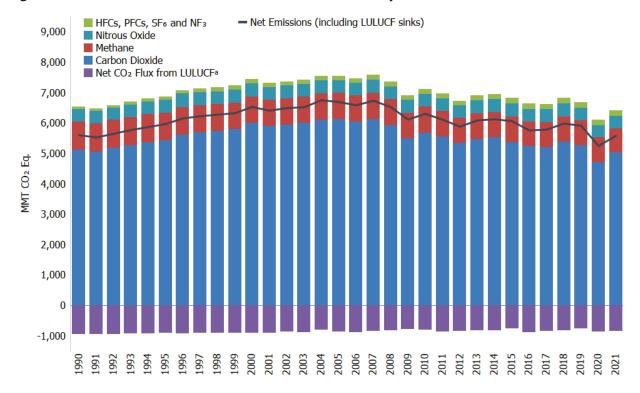
In 2021, total gross U.S. greenhouse gas emissions were 6,340.2 million metric tons of carbon dioxide equivalent (MMT CO₂ Eq.). ¹² Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions increased from 2020 to 2021 by 5.2 percent (314.3 MMT CO₂ Eq.). Net emissions (including sinks) were 5,586.0 MMT CO₂ Eq. in 2021. Overall, net emissions increased 6.4 percent from 2020 to 2021 and decreased 16.6 percent from 2005 levels as shown in Table ES-2. From 2019 to 2020, there was a sharp decline in emissions largely due to the impacts of the coronavirus (COVID-19) pandemic on travel and other economic activity. Between 2020 and 2021, the increase in total greenhouse gas emissions was driven largely by an increase in CO₂ emissions from fossil fuel combustion due to economic activity rebounding after the height of the COVID-19 pandemic. In 2021, CO₂ emissions from fossil fuel combustion increased by 6.8 percent relative to the previous year. Carbon dioxide emissions from natural gas use increased by 8.6 MMT CO₂ Eq., a 0.5 percent increase from 2020. In a shift from recent trends, CO₂ emissions from coal consumption increased by 121.7 MMT CO₂ Eq., a 14.6 percent increase from 2020. The increase in natural gas consumption and emissions in 2021 is observed across all sectors except the Electric Power sector and U.S. Territories, while the coal increase is primarily in the Electric Power sector. Emissions from petroleum use also increased by 163.9 MMT CO₂ Eq. (8.6 percent) from 2020 to 2021. In 2021, CO₂ emissions from fossil fuel combustion were 4,639.1 MMT CO₂ Eq., or 1.9 percent below emissions in 1990.

Figure ES-1 and Figure ES-2 illustrate the overall trends in total U.S. emissions by gas, annual percent changes, and relative change since 1990 for each year of the time series, and Table ES-2 provides information on trends in gross U.S. greenhouse gas emissions and sinks for 1990 through 2021. Unless otherwise stated, all tables and figures provide total gross emissions and exclude the greenhouse gas fluxes from the Land Use, Land-Use Change, and Forestry (LULUCF) sector. For more information about the LULUCF sector, see Section ES.3 Overview of Sector Emissions and Trends.

ES-4 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

¹² The gross emissions total presented in this report for the United States excludes emissions and removals from Land Use, Land-Use Change, and Forestry (LULUCF). The net emissions total presented in this report for the United States includes emissions and removals from LULUCF.





^a The term "flux" is used to describe the exchange of CO₂ to and from the atmosphere, with net flux being either positive or negative depending on the overall balance. Removal and long-term storage of CO₂ from the atmosphere is also referred to as "carbon sequestration."

Table ES-2: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (MMT CO₂ Eq.)

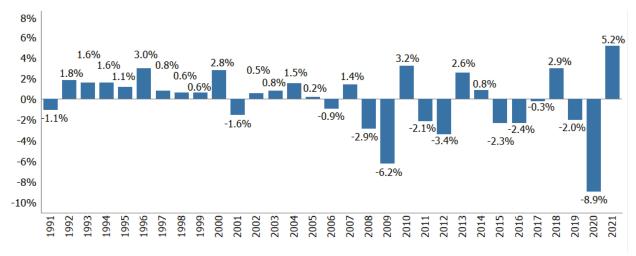
	0.0. 0	 	 15 E11111551C		111125 (1.11		1./
Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	5,121.0	6,132.2	5,212.2	5,377.8	5,262.1	4,714.6	5,032.2
CH₄ ^c	868.7	791.1	762.7	774.0	767.8	742.2	727.4
N_2O^c	406.3	415.8	414.7	430.2	410.3	388.9	393.3
HFCs	39.0	116.4	160.8	160.9	165.4	168.2	175.1
PFCs	21.8	6.1	3.8	4.3	4.0	3.9	3.5
SF ₆	30.5	15.5	7.2	7.1	7.8	7.5	8.0
NF ₃	+	0.4	0.5	0.5	0.5	0.6	0.6
Total Gross Emissions (Sources)	6,487.3	7,477.4	6,561.8	6,754.8	6,617.9	6,026.0	6,340.2
LULUCF Emissions ^a	57.9	72.4	68.3	64.4	64.2	76.4	77.8
CH ₄	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N_2O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Change ^b	(938.9)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
LULUCF Sector Net Total ^c	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks)	5,606.4	6,696.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0

⁺ Does not exceed 0.05 MMT CO₂ Eq.

^a LULUCF emissions subtotal of CH₄ and N₂O are reported separately from gross emissions totals. LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N₂O emissions from forest soils and settlement soils.

^b LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

Figure ES-2: Annual Percent Change in Gross U.S. Greenhouse Gas Emissions and Sinks Relative to the Previous Year



Improvements and Recalculations Relative to the Previous Inventory

Each year, some emission and sink estimates in the Inventory are recalculated and revised to incorporate improved methods and/or data. The most common reason for recalculating U.S. greenhouse gas emission estimates is to update recent historical data. Changes in historical data are generally the result of changes in data supplied by other U.S. government agencies or organizations, as they continue to make refinements and improvements. These improvements are implemented consistently across the previous Inventory's time series, as necessary, (i.e., 1990 to 2020) to ensure that the trend is accurate. In addition, for the current Inventory, CO₂-equivalent emission estimates have been updated to reflect the 100-year GWP values provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013).

Below are categories with methodological and data-related recalculations 13 resulting in an average change of greater than 2.5 MMT CO₂ Eq. over the time series.

- Forest Land Remaining Forest Land: Changes in Forest Carbon Stocks (CO₂)
- Wetlands Remaining Wetlands: Emissions from Flooded Land Remaining Flooded Land (CH₄)
- Biomass and Biodiesel Consumption (CO₂)
- Agricultural Soil Management (N₂O)
- Petroleum Systems (CH₄)
- Land Converted to Grassland: Changes in all Ecosystem Carbon Stocks (CO₂)
- Land Converted to Cropland: Changes in all Ecosystem Carbon Stocks (CO₂)
- Natural Gas Systems (CH₄)

 $^{^{}c}$ The LULUCF Sector Net Total is the net sum of all LULUCF CH $_{4}$ and $N_{2}O$ emissions to the atmosphere plus LULUCF net C stock changes.

Notes: Total (gross) are emissions presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

¹³ This does not include the recalculations related to the update from AR4 to AR5 GWP values. For more information on the impact of that update, please see Chapter 9, Recalculations and Improvements.

In addition, the Inventory includes two new categories not included in the previous Inventory that improve completeness of the national estimates: CO₂ emissions from the Substitution of Ozone Depleting Substances and CO₂ from the biogenic components of municipal solid waste combustion (reported as a memo item in the Inventory).

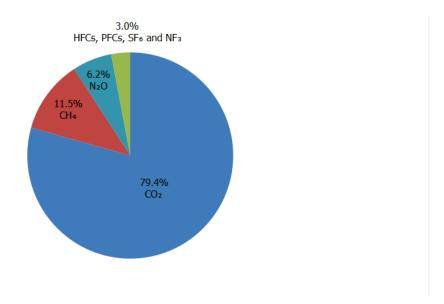
In each Inventory, the results of all methodological changes and historical data updates and the inclusion of new sources and sink estimates are summarized in the Recalculations and Improvements chapter (Chapter 9). Collectively, all methodological changes and historical data updates made in the current Inventory, including the quantitative effects of updating to from use of AR4 to AR5 GWPs in calculating CO₂-equivalent U.S. greenhouse gas emissions and sink for non-CO₂ emissions resulted in an annual average increase of 43.2 MMT CO₂ Eq. (0.7 percent) for net total emissions. The impact of methodological changes and historical data updates excluding quantitative effects of updating to AR5 GWP resulted in an annual average increase of 16.1 MMT CO₂ Eq. (0.3 percent) for net total emissions. For more detailed descriptions of each recalculation including references for data, please see the respective source or sink category description(s) within the relevant report chapter (i.e., the Energy chapter [Chapter 3], the Industrial Processes and Product Use [IPPU] chapter [Chapter 4], the Agriculture chapter [Chapter 5], the Land Use, Land-Use Change, and Forestry [LULUCF] chapter [Chapter 6], and the Waste chapter [Chapter 7]). In implementing improvements, the United States follows the 2006 IPCC Guidelines (IPCC 2006), which states,

"Both methodological changes and refinements over time are an essential part of improving inventory quality. It is good practice to change or refine methods when: available data have changed; the previously used method is not consistent with the IPCC guidelines for that category; a category has become key; the previously used method is insufficient to reflect mitigation activities in a transparent manner; the capacity for inventory preparation has increased; new inventory methods become available; and for correction of errors."

Emissions by Gas

Figure ES-3 illustrates the relative contribution of the greenhouse gases to total gross U.S. emissions in 2021, weighted by global warming potential. The primary greenhouse gas emitted by human activities in the United States is CO_2 , representing 79.4 percent of total greenhouse gas emissions. The largest source of CO_2 and of overall greenhouse gas emissions is fossil fuel combustion, primarily from transportation and power generation. Methane (CH_4) emissions account for 11.5 percent of emissions. The major sources of methane include enteric fermentation associated with domestic livestock, natural gas systems, and decomposition of wastes in landfills. Agricultural soil management, wastewater treatment, stationary sources of fuel combustion, and manure management are the major sources of N_2O emissions. Ozone depleting substance substitute emissions are the primary contributor to aggregate hydrofluorocarbon (HFC) emissions. Perfluorocarbon (PFC) emissions are primarily attributable to electronics manufacturing and primary aluminum production. Electrical transmission and distribution systems account for most sulfur hexafluoride (SF₆) emissions. The electronics industry is the only source of nitrogen trifluoride (NF₃) emissions.

Figure ES-3: 2021 Total Gross U.S. Greenhouse Gas Emissions by Gas (Percentages based on MMT CO₂ Eq.)



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above.

From 1990 to 2021, total emissions of CO_2 decreased by 88.7 MMT CO_2 Eq. (1.7 percent), total emissions of CO_2 decreased by 141.2 MMT CO_2 Eq. (16.3 percent), and emissions of N_2O decreased by 13.0 MMT CO_2 Eq. (3.2 percent). During the same period, emissions of fluorinated greenhouse gases including HFCs, PFCs, SF₆, and NF₃ rose by 95.9 MMT CO_2 Eq. (104.8 percent). From 1990 to 2021, emissions of HFCs increased by 136.1 MMT CO_2 Eq. (348.6 percent) and NF₃ emissions increased by 0.6 MMT CO_2 Eq. (1,318.9 percent), while emissions of PFCs decreased by 18.3 MMT CO_2 Eq. (83.8 percent) and SF₆ emissions decreased by 22.5 MMT CO_2 Eq. (73.7 percent). Despite being emitted in smaller quantities relative to the other principal greenhouse gases, emissions of HFCs, PFCs, SF₆ and NF₃ are significant because many of these gases have extremely high global warming potentials and, in the cases of PFCs and SF₆, long atmospheric lifetimes. Conversely, U.S. greenhouse gas emissions were partly offset by carbon (C) sequestration in forests, trees in urban areas, agricultural soils, landfilled yard trimmings and food scraps, and coastal wetlands, which together offset 13.1 percent of gross total emissions in 2021 (as reflected in Figure ES-1). The following sections describe each gas's contribution to total U.S. greenhouse gas emissions in more detail.

Carbon Dioxide Emissions

The global carbon cycle is made up of large carbon flows and reservoirs. Billions of tons of carbon in the form of CO_2 are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, global carbon fluxes among these various reservoirs are roughly balanced.¹⁴

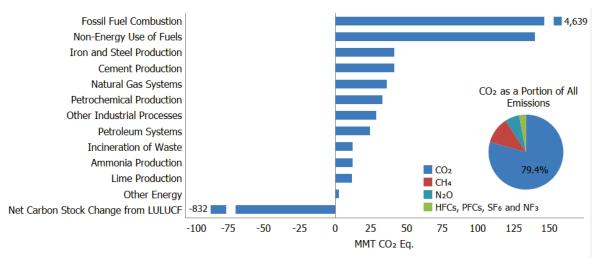
Since the Industrial Revolution (i.e., about 1750), global atmospheric concentrations of CO_2 have risen 48.1 percent (IPCC 2013; NOAA/ESRL 2023a), principally due to the combustion of fossil fuels for energy. Globally, an estimated

 $^{^{14}}$ The term "flux" is used to describe the exchange of CO_2 to and from the atmosphere, with net flux being either positive or negative depending on the overall balance. Removal and long-term storage of CO_2 from the atmosphere is also referred to as "carbon sequestration."

33,000 MMT of CO_2 were added to the atmosphere through the combustion of fossil fuels in 2021, of which the United States accounted for approximately 14.1 percent. ¹⁵

Overall CO_2 emissions have decreased 2 percent since 1990 and increased 7 percent since 2020, consistent with increases in fuel combustion as noted above. Within the United States, fossil fuel combustion accounted for 92.2 percent of CO_2 gross emissions in 2021. Nationally, the fossil fuel combustion transportation subsector was the largest emitter of CO_2 in 2021 followed by the electric power generation subsector. There are 27 additional sources of CO_2 emissions included in the Inventory (see Table 2-1). Although not illustrated in Table ES-4, changes in land use and forestry practices can also lead to net CO_2 emissions (e.g., through conversion of forest land to agricultural or urban use) or to a net sink for CO_2 (e.g., through net additions to forest biomass). See more on these emissions and removals in Table ES-4.





Note: Other Industrial Processes includes emissions from Aluminum Production, Carbide Production and Consumption, Carbon Dioxide Consumption, Ferroalloy Production, Glass Production, Lead Production, Magnesium Production, Other Process Uses of Carbonates, Phosphoric Acid Production, Substitution of Ozone Depleting Substances, Soda Ash Production, Titanium Dioxide Production, Urea Consumption for Non-Agricultural Purposes, and Zinc Production. Other Energy includes emissions from Abandoned Oil and Gas Wells and Coal Mining.

As the largest source of U.S. greenhouse gas emissions, CO₂ from fossil fuel combustion has accounted for an average of 74.8 percent of CO₂-equivalent total gross U.S. emissions across the time series. Between 1990 and 2021, CO₂ emissions from fossil fuel combustion decreased from 4,728.2 MMT CO₂ Eq. to 4,639.1 MMT CO₂ Eq., a 1.9 percent total decrease. Carbon dioxide emissions from fossil fuel combustion decreased by 1,108.2 MMT CO₂ Eq. from 2005 levels, a decrease of 19.3 percent. From 2020 to 2021, these emissions increased by 294.2 MMT CO₂ Eq. (6.8 percent).

Historically, changes in emissions from fossil fuel combustion have been the driving factor affecting U.S. emission trends. Changes in CO₂ emissions from fossil fuel combustion are influenced by many long-term and short-term factors. Important drivers include: (1) changes in demand for energy; and (2) a general decline in the overall carbon intensity of fuels combusted for energy in recent years by non-transport sectors of the economy. Long-term factors affecting energy demand include population and economic trends, technological changes including energy efficiency, shifting energy fuel choices, and various policies at the national, state, and local level. In the short term, the overall consumption and mix of fossil fuels in the United States fluctuates primarily in response to changes in general economic conditions, overall energy prices, the relative price of different fuels, weather, and

1

¹⁵ Global CO₂ emissions from fossil fuel combustion were taken from International Energy Agency *Global energy-related CO*₂ *emissions, 1990-2021 – Charts* Available at: https://www.iea.org/data-and-statistics/charts/global-energy-related-co2-emissions-1990-2021 (IEA 2022).

the availability of non-fossil alternatives. For example, between 2019 and 2021, changes in economic activity and travel due to the COVID-19 pandemic and the subsequent recovery have had significant impacts on energy use and fossil fuel combustion emissions.

The five major fuel-consuming economic sectors are transportation, electric power, industrial, residential, and commercial and are described below. Carbon dioxide emissions are produced by the electric power sector as fossil fuel is consumed to provide electricity to one of the other four sectors, or "end-use" sectors, see Figure ES-5. Note that this Figure reports emissions from U.S. Territories as their own end-use sector due to incomplete data for their individual end-use sectors. Fossil fuel combustion for electric power also includes emissions of less than 0.5 MMT CO₂ Eq. from geothermal-based generation.

Relative Contribution by Fuel Type 2,500 < 0.05% (Geothermal) 2,000 1,752 Coal 34.9% 1,541 MMT CO₂ Eq. 44.4% Natural Gas 1,500 Geothermal Petroleum 20.6% 1,000 776 500 313 233 24 0 Residential U.S. Territories Commercial Industrial **Electricity Generation** Transportation

Figure ES-5: 2021 CO₂ Emissions from Fossil Fuel Combustion by Sector and Fuel Type

Table ES-6 summarizes CO₂ emissions from fossil fuel combustion by end-use sector including electric power emissions. For Figure ES-6, electric power emissions have been distributed to each end-use sector on the basis of each sector's share of aggregate electricity use (i.e., indirect fossil fuel combustion). This method of distributing emissions assumes that each end-use sector uses electricity that is generated from the national average mix of fuels according to their carbon intensity. Emissions from electric power are also addressed separately after the end-use sectors are discussed.

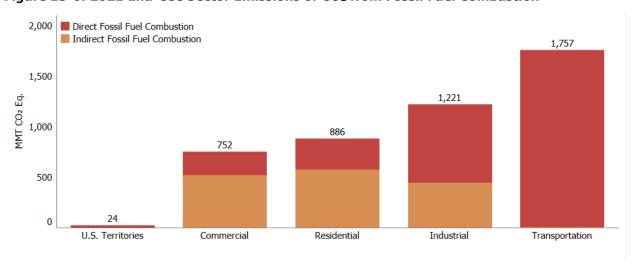


Figure ES-6: 2021 End-Use Sector Emissions of CO₂ from Fossil Fuel Combustion

Transportation End-Use Sector. Transportation activities accounted for 37.9 percent of U.S. CO₂ emissions from fossil fuel combustion in 2021, with the largest contributors being light-duty trucks (37.3 percent), followed by

Page 78 of 1050

freight trucks (23.3 percent) and passenger vehicles (20.8 percent). Annex 3.2 presents the total emissions from all transportation and mobile sources, including CO₂, CH₄, N₂O, and HFCs.

In terms of the overall trend, from 1990 to 2021, total transportation CO₂ emissions increased due, in large part, to increased demand for travel which was a result of a confluence of factors including population growth, economic growth, urban sprawl, and low fuel prices during the beginning of this period. From 2020 to 2021, transportation CO₂ emissions, excluding emissions from international bunker fuels, increased 11.4 percent, largely reflective of a rebound in travel activity as COVID-19 pandemic restrictions were eased. While an increased demand for travel has led to generally increasing CO₂ emissions since 1990, improvements in average new vehicle fuel economy since 2005 have slowed the rate of increase of CO₂ emissions. In 2021, petroleum-based products supplied 94.5 percent of the energy consumed for transportation, primarily from gasoline consumption in automobiles and other highway vehicles (53.3 percent), diesel fuel for freight trucks (24.1 percent), jet fuel for aircraft (10.4 percent), and natural gas, residual fuel, aviation gasoline, and liquefied petroleum gases (6.8 percent). The remaining 5.5 percent is associated with renewable fuels (i.e., biofuels).

Industrial End-Use Sector. Industrial CO₂ emissions, resulting both directly from the combustion of fossil fuels and indirectly from the generation of electricity that is used by industry, accounted for 26.3 percent of CO₂ emissions from fossil fuel combustion in 2021. Approximately 63.5 percent of these emissions resulted from direct fossil fuel combustion to produce steam and/or heat for industrial processes. The remaining emissions resulted from the use of electricity for motors, electric furnaces, ovens, lighting, and other applications. Total direct and indirect emissions from the industrial sector have declined by 20.7 percent since 1990. This decline is due to structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and efficiency improvements. From 2020 to 2021, total energy use in the industrial sector increased by 3.7 percent due to an increase in total industrial production and manufacturing output.

Residential and Commercial End-Use Sectors. The residential and commercial end-use sectors accounted for 19.1 and 16.2 percent, respectively, of CO₂ emissions from fossil fuel combustion in 2021 including indirect emissions from electricity. The residential and commercial sectors relied heavily on electricity for meeting energy demands, with 64.6 and 69.0 percent, respectively, of their emissions attributable to electricity use for lighting, heating, cooling, and operating appliances. The remaining emissions were due to the consumption of natural gas and petroleum for heating and cooking. Total direct and indirect emissions from the residential sector have decreased by 4.9 percent since 1990. Total direct and indirect emissions from the commercial sector have decreased by 1.9 percent since 1990. From 2020 to 2021, an increase in heating degree days (0.5 percent) increased energy demand for heating in the residential and commercial sectors, however, a 1.8 percent decrease in cooling degree days compared to 2020 reduced demand for air conditioning in the residential and commercial sectors. Combined, this resulted in a 1.5 percent increase in residential sector energy use. From 2020 to 2021 energy use in the commercial sector increased by 3.2 percent, due in part to the gradual recovery from the COVID-19 pandemic, which had reduced economic and manufacturing activity in 2020.

Electric Power. The United States relies on electricity to meet a significant portion of its energy demands. Electricity generators used 30.7 percent of U.S. energy from fossil fuels and emitted 33.2 percent of the CO₂ from fossil fuel combustion in 2021. The type of energy source used to generate electricity is the main factor influencing emissions. ¹⁶ The mix of fossil fuels used also impacts emissions. The electric power sector is the largest consumer of coal in the United States. The coal used by electricity generators accounted for 91.9 percent of all coal consumed for energy in the United States in 2021. 17 However, the amount of coal and the percent of total electricity generation from coal has been decreasing over time. Coal-fired electric generation (in kilowatt-hours

¹⁶ In line with the reporting requirements for inventories submitted under the UNFCCC, CO₂ emissions from biomass combustion have been estimated separately from fossil fuel CO₂ emissions and are not included in the electricity sector totals and trends discussed in this section. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for Land Use, Land-Use Change, and Forestry.

¹⁷ See Table 6.2 Coal Consumption by Sector of EIA (2022a).

[kWh]) decreased from 54.1 percent of generation in 1990 to 22.6 percent in 2021. ¹⁸ This corresponded with an increase in natural gas generation and non-fossil fuel renewable energy generation, largely from wind and solar energy. Natural gas generation (in kWh) represented 10.7 percent of electric power generation in 1990 and increased over the thirty-two-year period to represent 37.3 percent of electric power generation in 2021. Wind and solar generation (in kWh) represented 0.1 percent of electric power generation in 1990 and increased over the thirty-two-year period to represent 12.5 percent of electric power generation in 2021. The recovery from the COVID-19 pandemic led to an increase in electricity use of about 2.3 percent from 2020 to 2021. Between 2020 and 2021, coal electricity generation increased by 13.2 percent, natural gas generation decreased by 5.5 percent, and renewable energy generation increased by 1.7 percent.

Across the time series, changes in electricity generation and the carbon intensity of fuels used for electric power have a significant impact on CO_2 emissions. While CO_2 emissions from fossil fuel combustion from the electric power sector have decreased by 15.3 percent since 1990, the carbon intensity of the electric power sector, in terms of CO_2 Eq. per QBtu input, has significantly decreased during that same timeframe by 24.9 percent. This decoupling of the level of electric power generation and the resulting CO_2 emissions is shown in Figure ES-7.

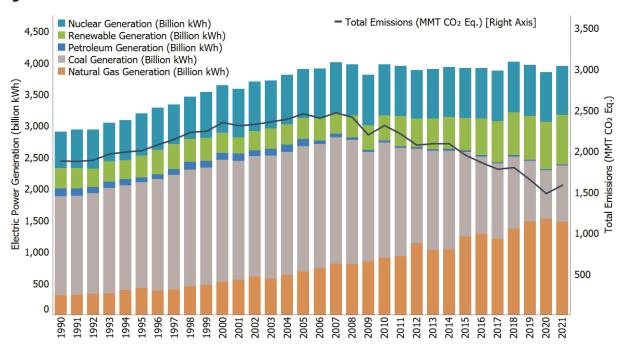


Figure ES-7: Electric Power Generation and Emissions

Other significant CO₂ trends included the following:

- Carbon dioxide emissions from natural gas and petroleum systems were 36.2 and 24.7 MMT CO₂ Eq., respectively, and combined accounted for 1.2 percent of CO₂ emissions and 1.0 percent of total gross emissions in 2021. These emissions increased by 19.1 MMT CO₂ Eq. (45.8 percent) from 1990 to 2021. This increase is due primarily to increases in the production segment, where flaring emissions from associated gas flaring, tanks, and miscellaneous production flaring have increased over time.
- Carbon dioxide emissions from iron and steel production and metallurgical coke production were 41.7
 MMT CO₂ Eq. in 2021 and accounted for 0.8 percent of CO₂ and total gross emissions. Emissions have

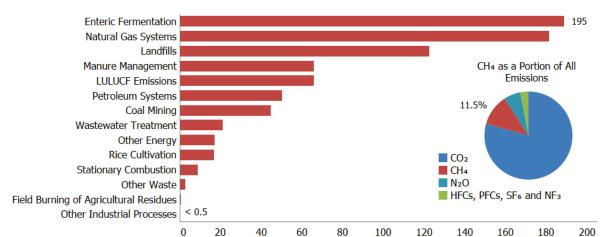
¹⁸ Values represent electricity *net* generation from the electric power sector. See Table 7.2b Electricity Net Generation: Electric Power Sector of EIA (2022a).

Page 80 of 1050

- decreased by 63.1 MMT CO₂ Eq. (60.2 percent) from 1990 through 2021. This decrease is primarily due to restructuring of the industry, technological improvements, and increased scrap steel utilization.
- Total C stock change (i.e., net CO₂ removals) in the LULUCF sector decreased by 11.4 percent between 1990 and 2021. This decrease was primarily due to a decrease in the rate of net C accumulation in forest C stocks and Cropland Remaining Cropland, as well as an increase in emissions from Land Converted to Settlements.

Methane Emissions

Methane (CH₄) is significantly more effective than CO₂ at trapping heat in the atmosphere—by a factor of 28 over a 100-year time frame based on the IPCC *Fifth Assessment Report* estimate (IPCC 2013). Over the last two hundred and fifty years, the concentration of CH₄ in the atmosphere increased by 170.8 percent (IPCC 2013; NOAA/ESRL 2023b). Within the United States, the main anthropogenic sources of CH₄ include enteric fermentation from domestic livestock, natural gas systems, landfills, domestic livestock manure management, coal mining, and petroleum systems (see Figure ES-8).



MMT CO₂ Eq.

Figure ES-8: 2021 Sources of CH₄ Emissions

Note: Other Energy includes CH₄ emissions from Abandoned Oil and Gas Wells, Incineration of Waste, and Mobile Combustion. Other Waste includes CH₄ emissions from Anaerobic Digestion at Biogas Facilities and Composting. Other Industrial Processes includes CH₄ emissions from Carbide Production and Consumption, Ferroalloy Production, Iron and Steel Production, and Petrochemical Production. LULUCF emissions include the CH₄ reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, Coastal Wetlands Remaining Coastal Wetlands, Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land.

Overall, CH₄ emissions in the United States in 2021, including LULUCF CH₄ emissions, accounted for 793.4 MMT CO₂ Eq., representing a decrease of 133.9 MMT CO₂ Eq. (14.4 percent) since 1990 and 14.3 MMT CO₂ Eq. (1.8 percent) since 2020. Significant trends for the largest sources of anthropogenic CH₄ emissions include the following:

- Enteric fermentation was the largest anthropogenic source of CH₄ emissions in the United States in 2021, accounting for 194.9 MMT CO₂ Eq. of CH₄ (26.4 percent of total CH₄ emissions and 3.1 percent of total gross emissions) and representing an increase of 11.9 MMT CO₂ Eq. (6.5 percent) since 1990. This increase in emissions from 1990 to 2021 generally follows the increasing trends in cattle populations.
- Natural gas systems were the second largest anthropogenic source category of CH₄ emissions in the
 United States in 2021, accounting for 181.4 MMT CO₂ Eq. of CH₄ (22.9 percent of total CH₄ emissions and
 2.9 percent of total gross emissions). Emissions decreased by 33.7 MMT CO₂ Eq. (15.7 percent) since 1990
 largely due to decreases in emissions from distribution, transmission, and storage.

Landfills were the third largest anthropogenic source of CH₄ emissions in the United States in 2021, accounting for 122.6 MMT CO₂ Eq. (15.5 percent of total CH₄ emissions and 1.9 percent of total gross emissions) and representing a decrease of 75.1 MMT CO2 Eq. (38.0 percent) since 1990, with small yearto-year increases. This downward trend in emissions coincided with increased landfill gas collection and control systems, and a reduction of decomposable materials (i.e., paper and paperboard, food scraps, and yard trimmings) discarded in MSW landfills over the time series. 19

Nitrous Oxide Emissions

Nitrous oxide (N2O) is produced by biological processes that occur in soil and water and by a variety of anthropogenic activities in the agricultural, energy, industrial, and waste management fields. While total N₂O emissions are much lower than CO₂ emissions, N₂O is 265 times more powerful than CO₂ at trapping heat in the atmosphere over a 100-year time frame (IPCC 2013). Since 1750, the global atmospheric concentration of N₂O has risen by 23.8 percent (IPCC 2013; NOAA/ESRL 2023c). The main anthropogenic activities producing N₂O in the United States are agricultural soil management, wastewater treatment, stationary fuel combustion, manure management, fuel combustion in motor vehicles, and nitric acid production (see Figure ES-9).

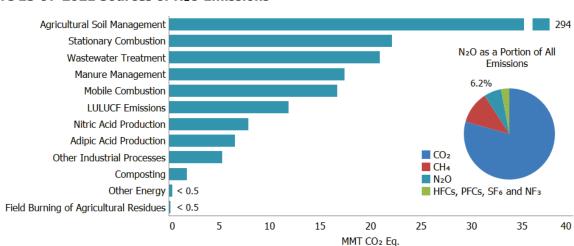


Figure ES-9: 2021 Sources of N₂O Emissions

Note: Other Industrial Processes includes N₂O emissions from Caprolactam, Glyoxal, and Glyoxylic Acid Production; Electronics Industry; and Product Uses. Other Energy includes N₂O emissions from Petroleum Systems, Natural Gas Systems, and Incineration of Waste. LULUCF emissions include N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, Coastal Wetlands Remaining Coastal Wetlands, Forest Soils, and Settlement Soils.

Overall, N₂O emissions in the United States in 2021, including LULUCF N₂O emissions, accounted for 405.1 MMT CO₂ Eq., representing an increase of 3.3 MMT CO₂ Eq. (0.8 percent) since 1990 and an increase of 5.3 MMT CO₂ Eq. (1.3 percent) since 2020. Significant trends for the largest sources of anthropogenic N₂O emissions include the following:

Agricultural soils were the largest anthropogenic source of N₂O emissions in 2021, accounting for 294.0 MMT CO₂ Eq., 72.6 percent of N₂O emissions and 4.6 percent of total gross greenhouse gas emissions in the United States. These emissions increased by 6.1 MMT CO₂ Eq. (2.1 percent) from 1990 to 2021, but have fluctuated during that period due to annual variations in weather patterns, fertilizer use, and crop production.

 $^{^{19}}$ Carbon dioxide emissions from landfills are not included specifically in summing waste sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs and decay of disposed wood products are accounted for in the estimates for LULUCF.

- Stationary combustion was the second largest source of anthropogenic N₂O emissions in 2021, accounting for 22.1 MMT CO₂ Eq. (5.5 percent of N₂O emissions) and 0.3 percent of total gross U.S. greenhouse gas emissions in 2021. Stationary combustion emissions peaked in 2007, and have steadily decreased since then.
- Wastewater treatment, both domestic and industrial, was the third largest anthropogenic source of N₂O emissions in 2021, accounting for 20.9 MMT CO₂ Eq., 5.2 percent of N₂O emissions and 0.3 percent of total gross greenhouse gas emissions in the United States in 2021. Emissions from wastewater treatment increased by 6.1 MMT CO₂ Eq. (41.6 percent) since 1990 as a result of growing U.S. population and protein consumption. Nitrous oxide emissions from industrial wastewater treatment sources fluctuated throughout the time series with production changes associated with the treatment of wastewater from the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and brewery industries.
- Nitrous oxide emissions from manure management accounted for 17.4 MMT CO₂ Eq., 4.3 percent of N₂O emissions and 0.3 percent of total gross greenhouse gas emissions in the United States in 2021. These emissions increased by 5.0 MMT CO₂ Eq. (40.5 percent) from 1990 to 2021. While the industry trend has been a shift toward liquid systems, driving down the emissions per unit of nitrogen excreted (dry manure handling systems have greater aerobic conditions that promote N₂O emissions), increases in specific animal populations have driven an increase in overall manure management N₂O emissions over the time series.
- Nitrous oxide emissions from mobile combustion, the fifth largest anthropogenic source of N₂O emissions in 2021, decreased by 21.7 MMT CO₂ Eq. (56.6 percent) from 1990 to 2021, primarily as a result of national vehicle emissions standards and emission control technologies for on-road vehicles.

HFC, PFC, SF₆, and NF₃ Emissions

Hydrofluorocarbons (HFCs) are synthetic chemicals that are used as alternatives to ozone depleting substances (ODS), which are being phased out under the Montreal Protocol and Clean Air Act Amendments of 1990. Hydrofluorocarbons do not deplete the stratospheric ozone layer and therefore have been used as alternatives under the *Montreal Protocol on Substances that Deplete the Ozone Layer*.

Perfluorocarbons (PFCs) are emitted from the production of electronics and aluminum and also (in smaller quantities) from their use as alternatives to ozone depleting substances. Sulfur hexafluoride (SF₆) is emitted from the manufacturing and use of electrical transmission and distribution equipment as well as the production of electronics and magnesium. NF₃ is emitted from electronics production. HFCs are also emitted during production of HCFC-22 and electronics (see Figure ES-10).

HFCs, PFCs, SF₆, and NF₃ are potent greenhouse gases. In addition to having very high global warming potentials, SF₆, NF₃, and PFCs have extremely long atmospheric lifetimes, resulting in their essentially irreversible accumulation in the atmosphere once emitted. Sulfur hexafluoride is the most potent greenhouse gas the IPCC has evaluated (IPCC 2021).

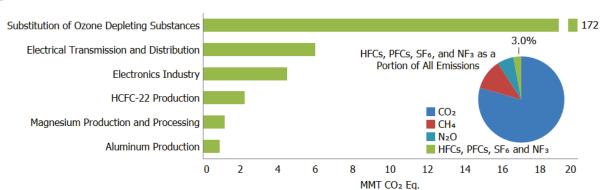


Figure ES-10: 2021 Sources of HFCs, PFCs, SF₆, and NF₃ Emissions

Some significant trends for the largest sources of U.S. HFC, PFC, SF₆, and NF₃ emissions include the following:

- Hydrofluorocarbon and perfluorocarbon emissions resulting from their use as substitutes for ODS (e.g., chlorofluorocarbons [CFCs]) are the largest share of fluorinated emissions (92.1 percent) in 2021 and have been consistently increasing, from small amounts in 1990 to 172.5 MMT CO₂ Eq. in 2021. This increase was in large part the result of efforts to phase out CFCs and other ODS in the United States.
- Sulfur hexafluoride emissions from electric power transmission and distribution systems decreased by 18.7 MMT CO₂ Eq. (75.7 percent) from 1990 to 2021. There are two factors contributing to this decrease:
 (1) a sharp increase in the price of SF₆ during the 1990s and (2) a growing awareness of the environmental impact of SF₆ emissions through programs such as EPA's SF₆ Emission Reduction Partnership for Electric Power Systems.
- HFC-23 emissions from HCFC-22 production decreased by 36.4 MMT CO₂ Eq. (94.2 percent) from 1990 to 2021. The decrease from 1990 emissions was caused primarily by a reduction in the HFC-23 emission rate (kg HFC-23 emitted/kg HCFC-22 produced). The emission rate was lowered by optimizing the production process and capturing much of the remaining HFC-23 for use or destruction.
- PFC emissions from aluminum production decreased by 18.4 MMT CO₂ Eq. (95.3 percent) from 1990 to 2021, due to both industry emission reduction efforts and lower domestic aluminum production.

ES.3 Overview of Sector Emissions and Trends

Figure ES-11 and Table ES-3 aggregate emissions and sinks by the sectors defined by the UNFCCC reporting guidelines and methodological framework in the IPCC Guidelines to promote comparability across countries. Over the thirty-two-year period of 1990 to 2021, total emissions from the Energy and Waste sectors decreased by 171.4 MMT CO_2 Eq. (3.2 percent) and 66.8 MMT CO_2 Eq. (28.3 percent) respectively. Emissions from the Industrial Processes and Product Use and Agriculture sectors grew by 41.0 MMT CO_2 Eq. (12.2 percent), and 50.0 MMT CO_2 Eq. (9.1 percent), respectively. Over the same period, the overall net flux from LULUCF (i.e., the net sum of all CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 Eq.) decreased 126.7 MMT CO_2 Eq. (14 percent) and resulted in a removal of 754.2 MMT CO_2 Eq. in 2021.

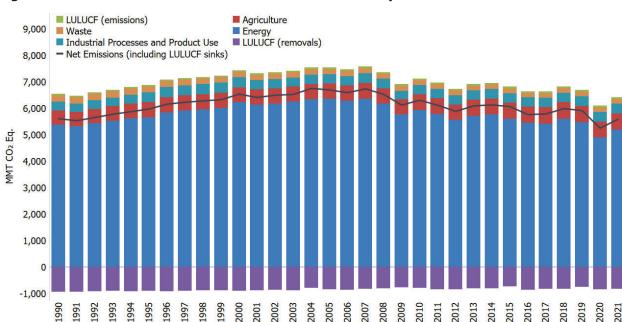


Figure ES-11: U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector

Table ES-3: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector (MMT CO₂ Eq.)

IPCC Sector	1990	2005	2017	2018	2019	2020	2021
Energy	5,368.0	6,351.5	5,418.7	5,589.5	5,460.6	4,894.0	5,196.6
Industrial Processes and Product Use	335.4	356.1	359.1	362.2	366.8	363.2	376.4
Agriculture	548.0	577.7	613.1	629.5	614.5	597.3	598.1
Waste	236.0	192.1	170.9	173.7	176.0	171.5	169.2
Total Gross Emissions ^a (Sources)	6,487.3	7,477.4	6,561.8	6,754.8	6,617.9	6,026.0	6,340.2
LULUCF Sector Net Total ^b	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks) ^c	5,606.4	6,696.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0

^a Total emissions without LULUCF.

Notes: Total emissions presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Energy

The Energy chapter contains emissions of all greenhouse gases resulting from stationary and mobile energy activities including fuel combustion and fugitive fuel emissions, and the use of fossil fuels for non-energy purposes. Energy-related activities, primarily fossil fuel combustion, accounted for the vast majority of U.S. CO_2 emissions for the period of 1990 through 2021. Energy-related activities are also responsible for CH_4 and N_2O emissions (41.6 percent and 10.0 percent of total U.S. emissions of each gas, respectively). Overall, emission sources in the Energy chapter account for a combined 82.0 percent of total gross U.S. greenhouse gas emissions in 2021. Emissions from energy increased by 302.6 MMT CO_2 Eq. (6.2 percent) since 2020, but they have decreased by 171.4 MMT CO_2 Eq. (3.2 percent) since 1990.

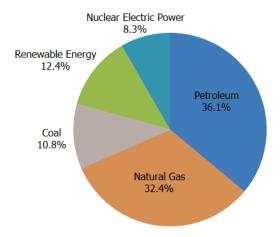
In 2021, 79.3 percent of the energy used in the United States (on a Btu basis) was produced through the combustion of fossil fuels. The remaining 20.7 percent came from other energy sources, such as hydropower, biomass, nuclear, wind, and solar energy (see Figure ES-12).

 $^{^{\}rm b}$ The LULUCF Sector Net Total is the sum of all LULUCF CH $_4$ and N $_2$ O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO $_2$ Eq.

^c Net emissions with LULUCF.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 85 of 1050 PageID 3533

Figure ES-12: 2021 U.S. Energy Consumption by Energy Source (Percent)



Industrial Processes and Product Use

The Industrial Processes and Product Use (IPPU) chapter contains greenhouse gas emissions generated and emitted as the byproducts of non-energy-related industrial processes, which involve the chemical or physical transformation of raw materials and can release waste gases such as CO₂, CH₄, N₂O, and fluorinated gases (e.g., HFC-23). These processes include iron and steel production and metallurgical coke production, cement production, petrochemical production, ammonia production, lime production, other process uses of carbonates (e.g., flux stone, flue gas desulfurization, and soda ash consumption not associated with glass manufacturing), nitric acid production, adipic acid production, urea consumption for non-agricultural purposes, aluminum production, HCFC-22 production, glass production, soda ash production, ferroalloy production, titanium dioxide production, caprolactam production, zinc production, phosphoric acid production, lead production, and silicon carbide production and consumption. Most of these industries also emit CO₂ from fossil fuel combustion which, in line with IPCC sectoral definitions, is included in the Energy sector.

This chapter also contains emissions resulting from the release of HFCs, PFCs, SF₆, and NF₃ and other man-made compounds used in industrial manufacturing processes and by end-consumers (e.g., residential and mobile air conditioning). These industries include electronics manufacturing, electric power transmission and distribution, and magnesium metal production and processing. In addition, N_2O is used in and emitted by electronics industry and anesthetic and aerosol applications, and CO_2 is consumed and emitted through various end-use applications. In 2021, emissions resulting from use of the substitution of ODS (e.g., chlorofluorocarbons [CFCs]) by end-consumers was the largest source of IPPU emissions and accounted for 172.5 MMT CO_2 Eq, or 45.8 percent of total IPPU emissions.

IPPU activities are responsible for 3.4, 0.1, and 5.0 percent of total U.S. CO_2 , CH_4 , and N_2O emissions respectively as well as for all U.S. emissions of fluorinated gases including HFCs, PFCs, SF₆ and NF₃. Overall, emission sources in the IPPU chapter accounted for 5.9 percent of U.S. greenhouse gas emissions in 2021. IPPU emissions increased by 13.2 MMT CO_2 Eq. (3.6 percent) since 2020 and by 41 MMT CO_2 Eq. (12.2 percent) since 1990, mostly due to increased use of ODS substitutes (e.g., HFCs).

Agriculture

The Agriculture chapter contains information on anthropogenic emissions from agricultural activities (except fuel combustion, which is addressed in the Energy chapter, and some agricultural CO₂, CH₄, and N₂O fluxes, which are addressed in the Land Use, Land-Use Change, and Forestry chapter).

Agricultural activities contribute directly to emissions of greenhouse gases through a variety of processes, including the following sources: agricultural soil management, enteric fermentation in domestic livestock, livestock manure management, rice cultivation, urea fertilization, liming, and field burning of agricultural residues.

In 2021, agricultural activities were responsible for emissions of 598.1 MMT CO₂ Eq., or 9.4 percent of total gross U.S. greenhouse gas emissions. Agriculture sector emissions increased slightly (0.8 MMT CO₂ Eq. or 0.1 percent) since 2020 and have increased by 50 MMT CO₂ Eq. (9.1 percent) since 1990, mostly from trends in enteric fermentation and manure management. Methane, N2O, and CO2 are greenhouse gases emitted by agricultural activities. Methane emissions from enteric fermentation and manure management represented 35.9 percent of total CH₄ emissions from anthropogenic activities in 2021. Agricultural soil management activities, such as application of synthetic and organic fertilizers, deposition of livestock manure, and growing N-fixing plants, were the largest contributors to U.S. N₂O emissions in 2021, accounting for 74.8 percent of total N₂O emissions. Carbon dioxide emissions from the application of crushed limestone and dolomite (i.e., soil liming) and urea fertilization represented 0.2 percent of total CO₂ emissions from anthropogenic activities.

Land Use, Land-Use Change, and Forestry

The LULUCF chapter contains emissions and removals of CO₂ and emissions of CH₄ and N₂O from managed lands in the United States. Consistent with the 2006 IPCC Guidelines, emissions and removals from managed lands are considered to be anthropogenic, while emissions and removals from unmanaged lands are considered to be natural. 20 The share of managed land in the U.S. is approximately 95 percent of total land included in the Inventory. ²¹ More information on the definition of managed land used in the Inventory is provided in Chapter 6.

Overall, the Inventory results show that managed land is a net sink for CO₂ (C sequestration). The primary drivers of fluxes on managed lands include forest management practices, tree planting in urban areas, the management of agricultural soils, lands remaining and lands converted to reservoirs and other constructed waterbodies, landfilling of yard trimmings and food scraps, and activities that cause changes in C stocks in coastal wetlands. The main drivers for forest C sequestration include forest growth and increasing forest area (i.e., afforestation), as well as a net accumulation of C stocks in harvested wood pools. The net sequestration in Settlements Remaining Settlements, which occurs predominantly from urban forests (i.e., Settlement Trees) and landfilled yard trimmings and food scraps, is a result of net tree growth and increased urban forest area, as well as long-term accumulation of yard trimmings and food scraps carbon in landfills.

The LULUCF sector in 2021 resulted in a net increase in C stocks (i.e., net CO₂ removals) of 832.0 MMT CO₂ Eq.²² The removals of C offset 13.1 percent of total gross greenhouse gas emissions in 2021. Emissions of CH₄ and N₂O from LULUCF activities in 2021 were 77.8 MMT CO2 Eq. and represent 1.4 percent of net greenhouse gas emissions. 23 Carbon dioxide removals from C stock changes are presented in Table ES-4 along with CH4 and N2O emissions for LULUCF source categories.

Executive Summary

²⁰ See http://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/4 Volume4/V4 01 Ch1 Introduction.pdf.

²¹ The current land representation does not include land in U.S. Territories, but there are planned improvements to include these regions in future Inventories. U.S. Territories represent approximately 0.1 percent of the total land base for the United States. See Box 6-2 in Chapter 6 of this report.

²² LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

²³ LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands; and N2O emissions from forest soils and settlement soils.

Between 1990 and 2021, total C sequestration in the LULUCF sector decreased by 11.4 percent, primarily due to a decrease in the rate of net C accumulation in forests and Cropland Remaining Cropland, as well as an increase in CO_2 emissions from Land Converted to Settlements. The overall net flux from LULUCF (i.e., net sum of all CH₄ and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 eq.) resulted in a removal of 754.2 MMT CO_2 Eq. in 2021.

Flooded lands were the largest source of CH_4 emissions from the LULUCF sector in 2021, totaling 45.4 MMT CO_2 Eq. (1,623 kt of CH_4). Forest fires were the second largest source and resulted in CH_4 emissions of 15.5 MMT CO_2 Eq. (554 kt of CH_4), followed by Coastal Wetlands Remaining Coastal Wetlands with CH_4 emissions of 4.3 MMT CO_2 Eq. (154 kt of CH_4).

Forest fires were the largest source of N_2O emissions from the LULUCF sector in 2021, totaling 8.9 MMT CO_2 Eq. (34 kt of N_2O). Nitrous oxide emissions from fertilizer application to settlement soils in 2021 totaled 2.1 MMT CO_2 Eq. (8 kt of N_2O).

Table ES-4: U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO₂ Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Forest Land Remaining Forest Landa	(815.8)	(695.4)	(695.2)	(692.9)	(638.1)	(684.0)	(670.5)
Land Converted to Forest Landb	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland ^c	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grasslandd	8.8	11.7	11.6	11.9	14.6	6.7	10.6
Land Converted to Grassland ^c	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlandse	41.5	43.1	41.8	41.8	41.8	41.8	41.8
Land Converted to Wetlandse	3.3	1.4	0.8	0.8	0.8	0.6	0.6
Settlements Remaining Settlements ^f	(107.8)	(113.9)	(125.6)	(125.0)	(124.5)	(131.6)	(132.5)
Land Converted to Settlements ^c	62.5	85.0	80.9	81.0	81.1	81.0	81.0
LULUCF Carbon Stock Change ^g	(938.9)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
LULUCF Emissionsh	57.9	72.4	68.3	64.4	64.2	76.4	77.8
CH ₄	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N ₂ O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Sector Net Totali	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)

^a Includes the net changes to carbon stocks stored in all forest ecosystem pools and harvested wood products, emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land, emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land, and CH₄ and N₂O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

^b Includes the net changes to carbon stocks stored in all forest ecosystem pools.

^c Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements, respectively. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements, respectively.

 $^{^{\}rm d}$ Estimates include CH $_{\rm 4}$ and N $_{\rm 2}$ O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

e Estimates include CH4 emissions from Flooded Land Remaining Flooded Land and Land Converted to Flooded Land.

^f Estimates include N₂O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.

g LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land use conversion categories.

h LULUCF emissions subtotal includes the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N₂O emissions from forest soils and settlement soils. Emissions values are included in land-use category rows.

¹ The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 88 of 1050 PageID 3536

Waste

The Waste chapter contains emissions from waste management activities (except the incineration of waste, which is addressed in the Energy chapter). Landfills were the largest source of anthropogenic greenhouse gas emissions from waste management activities, generating 122.6 MMT CO₂ Eq. and accounting for 72.5 percent of total greenhouse gas emissions from waste management activities, and 16.9 percent of total U.S. CH₄ emissions.²⁴ Additionally, wastewater treatment generated emissions of 42.0 MMT CO₂ Eq. and accounted for 24.8 percent of total Waste sector greenhouse gas emissions, 2.9 percent of U.S. CH₄ emissions, and 5.3 percent of U.S. N₂O emissions in 2021. Emissions of CH₄ and N₂O from composting are also accounted for in this chapter, generating emissions of 2.6 MMT CO₂ Eq., and 1.8 MMT CO₂ Eq., respectively. Anaerobic digestion at biogas facilities generated CH₄ emissions of 0.2 MMT CO₂ Eq., accounting for 0.1 percent of emissions from the waste sector. Overall, emission sources accounted for in the Waste chapter generated 169.2 MMT CO₂ Eq., or 2.7 percent of total gross U.S. greenhouse gas emissions in 2021. Waste sector emissions decreased by 2.4 MMT CO₂ Eq. (1.4 percent) since 2020 and by 66.8 MMT CO₂ Eq. (28.3 percent) since 1990.

ES.4 Other Information

Emissions by Economic Sector

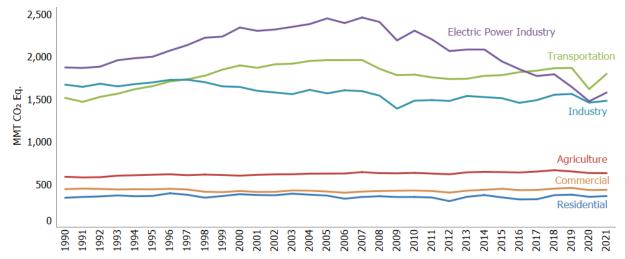
Throughout the *Inventory of U.S. Greenhouse Gas Emissions and Sinks* report, emission estimates are grouped into five sectors (i.e., chapters) defined by the IPCC: Energy, IPPU, Agriculture, LULUCF, and Waste. It is also useful to characterize emissions according to commonly used economic sector categories: Residential, Commercial, Industry, Transportation, Electric Power, and Agriculture. Emissions from U.S. Territories are reported as their own end-use sector due to a lack of specific consumption data for the individual end-use sectors within U.S. Territories. For more information on trends in the Land Use, Land-Use Change, and Forestry sector, see Section ES.2 Recent Trends in U.S. Greenhouse Gas Emissions and Sinks.

Figure ES-13 shows the trend in emissions by economic sector from 1990 to 2021, and Table ES-5 summarizes emissions from each of these economic sectors.

²⁴ Landfills also store carbon, due to incomplete degradation of organic materials such as harvest wood products, yard trimmings, and food scraps, as described in the Land Use, Land-Use Change, and Forestry chapter of the Inventory report.

Executive Summary

Figure ES-13: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

Table ES-5: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors (MMT CO₂ Eq.)

Economic Sectors	1990	2005	2017	2018	2019	2020	2021
Transportation	1,521.4	1,966.0	1,841.6	1,871.3	1,874.3	1,624.9	1,804.3
Electric Power Industry	1,879.7	2,456.9	1,779.2	1,799.1	1,650.5	1,481.8	1,584.1
Industry	1,677.3	1,574.4	1,494.5	1,558.0	1,568.2	1,465.4	1,487.3
Agriculture	592.9	630.2	654.2	670.6	655.4	637.2	635.8
Commercial	447.0	418.9	437.6	453.7	462.0	436.0	439.2
Residential	345.6	371.2	328.4	375.8	382.4	356.9	365.6
U.S. Territories	23.4	59.7	26.3	26.3	25.1	23.6	24.1
Total Gross Emissions (Sources)	6,487.3	7,477.4	6,561.8	6,754.8	6,617.9	6,026.0	6,340.2
LULUCF Sector Net Total ^a	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks)	5,606.4	6,696.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0

^a The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Total (gross) emissions are presented without LULUCF. Total net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Using this categorization, emissions from transportation activities accounted for the largest portion (28.5 percent) of total gross U.S. greenhouse gas emissions in 2021. Electric power accounted for the second largest portion (25.0 percent) of U.S. greenhouse gas emissions in 2021, while emissions from industry accounted for the third largest portion (23.5 percent). Emissions from industry have in general declined over the past decade, due to a number of factors, including structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and energy efficiency improvements.

The remaining 23.1 percent of U.S. greenhouse gas emissions were contributed by, in order of magnitude, the agriculture, commercial, and residential sectors, plus emissions from U.S. Territories. Activities related to agriculture accounted for 10.0 percent of U.S. emissions; unlike other economic sectors, agricultural sector emissions were dominated by N_2O emissions from agricultural soil management and CH_4 emissions from enteric fermentation. An increasing amount of carbon is stored in agricultural soils each year, but this CO_2 sequestration is assigned to the LULUCF sector rather than the agriculture economic sector. The commercial and residential sectors accounted for 6.9 percent and 5.8 percent of emissions, respectively, and U.S. Territories accounted for 0.4

percent of emissions; emissions from these sectors primarily consisted of CO_2 emissions from fossil fuel combustion. Carbon dioxide was also emitted and sequestered by a variety of activities related to forest management practices, tree planting in urban areas, the management of agricultural soils, landfilling of yard trimmings, and changes in C stocks in coastal wetlands.

Document 15-20

Electricity is ultimately used in the economic sectors described above. Table ES-6 presents greenhouse gas emissions from economic sectors with emissions related to electric power distributed into end-use categories (i.e., emissions from electric power generation are allocated to the economic sectors in which the electricity is used). To distribute electricity emissions among end-use sectors, emissions from the source categories assigned to electric power were allocated to the residential, commercial, industry, transportation, and agriculture economic sectors according to retail sales of electricity for each end-use sector (EIA 2022). These source categories include CO_2 from fossil fuel combustion and the use of limestone and dolomite for flue gas desulfurization, CO_2 and N_2O from incineration of waste, CH_4 and N_2O from stationary sources, and SF_6 from electrical transmission and distribution systems.

When emissions from electricity use are distributed among these end-use sectors, industrial activities and transportation account for the largest shares of U.S. greenhouse gas emissions (30.1 percent and 28.5 percent, respectively) in 2021. The commercial and residential sectors contributed the next largest shares of total gross U.S. greenhouse gas emissions in 2021 (15.3 and 15.0 percent, respectively). Emissions from the commercial and residential sectors increase substantially when emissions from electricity use are included, due to their relatively large share of electricity use for energy (e.g., lighting, cooling, appliances). Figure ES-14 shows the trend in these emissions by sector from 1990 to 2021.

Table ES-6: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed by Economic Sector (MMT CO₂ Eq.)

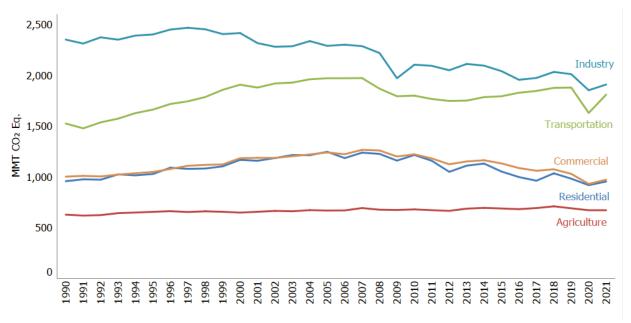
Economic Sectors	1990	2005	2017	2018	2019	2020	2021
Industry	2,351.1	2,289.9	1,973.9	2,033.2	2,011.2	1,852.9	1,909.2
Transportation	1,524.6	1,970.9	1,846.0	1,876.2	1,879.2	1,629.2	1,809.5
Commercial	1,002.4	1,241.0	1,060.4	1,074.5	1,029.7	930.5	972.2
Residential	957.8	1,247.5	962.3	1,034.9	982.0	918.3	953.8
Agriculture	628.0	668.5	693.0	709.8	690.7	671.5	671.5
U.S. Territories	23.4	59.7	26.3	26.3	25.1	23.6	24.1
Total Gross Emissions (Sources)	6,487.3	7,477.4	6,561.8	6,754.8	6,617.9	6,026.0	6,340.2
LULUCF Sector Net Total ^a	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks)	5,606.4	6,696.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0

^a The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Emissions from electric power are allocated based on aggregate electricity use in each end-use sector. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

²⁵ U.S. Territories consumption data that are obtained from EIA are only available at the aggregate level and cannot be broken out by end-use sector. The distribution of emissions to each end-use sector for the 50 states does not apply to territories data.

Figure ES-14: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed to Economic Sectors



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

Box ES-2: Trends in Various U.S. Greenhouse Gas Emissions-Related Data

Total (gross) greenhouse gas emissions can be compared to other economic and social indices to highlight changes over time. These comparisons include: (1) emissions per unit of aggregate energy use, because energy-related activities are the largest sources of emissions; (2) emissions per unit of fossil fuel consumption, because almost all energy-related emissions involve the combustion of fossil fuels; (3) emissions per unit of total gross domestic product as a measure of national economic activity; and (4) emissions per capita.

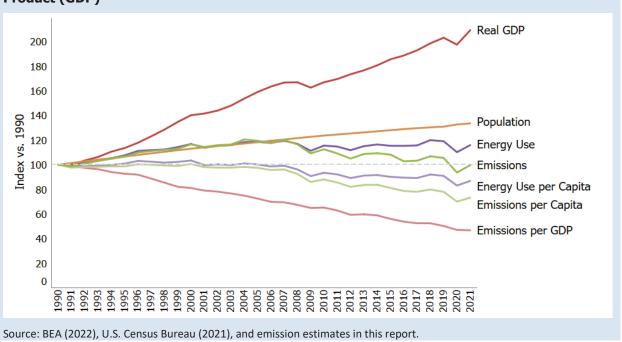
Table ES-7 provides data on various statistics related to U.S. greenhouse gas emissions normalized to 1990 as a baseline year. These values represent the relative change in each statistic since 1990. Greenhouse gas emissions in the United States have declined at an average annual rate of 0.02 percent since 1990, although changes from year to year have been significantly larger. This growth rate is slightly slower than that for total energy use and fossil fuel consumption, and overall gross domestic product (GDP), and national population (see Figure ES-15). The direction of these trends started to change after 2005, when greenhouse gas emissions, total energy use, and fossil fuel consumption began to peak. Greenhouse gas emissions in the United States have decreased at an average annual rate of 0.9 percent since 2005. Fossil fuel consumption has decreased at a slower rate than emissions since 2005, while total energy use, GDP, and national population, generally, continued to increase noting 2020 was impacted by COVID-19 pandemic.

Table ES-7: Recent Trends in Various U.S. Data (Index 1990 = 100)

								Avg. Annual	Avg. Annual
								Growth Rate	Growth Rate
Variable	1990	2005	2017	2018	2019	2020	2021	Since 1990 ^a	Since 2005 ^a
Greenhouse Gas									
Emissions ^b	100	115	101	104	102	93	98	(+)%	-1.0%
Energy Use ^c	100	119	116	120	119	109	115	0.5%	-0.1%
GDP ^d	100	159	193	199	203	198	209	2.4%	1.8%
Population ^e	100	118	130	130	131	133	134	0.9%	0.8%

- + Absolute value does not exceed 0.05 percent.
- ^a Average annual growth rate.
- ^b Gross total GWP-weighted values.
- ^c Energy content-weighted values (EIA 2022).
- ^d GDP in chained 2012 dollars (BEA 2022).
- e U.S. Census Bureau (2021).

Figure ES-15: U.S. Greenhouse Gas Emissions Per Capita and Per Dollar of Gross Domestic Product (GDP)



Key Categories

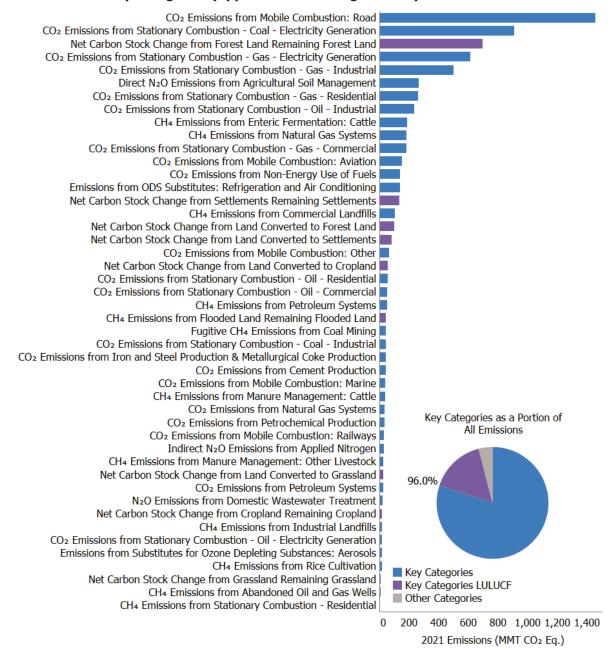
The 2006 IPCC Guidelines (IPCC 2006) and 2019 Refinement to the 2006 IPCC Guidelines (IPCC 2019) defines key categories as "inventory categories which individually, or as a group of categories (for which a common method, emission factor and activity data are applied) are prioritized within the national inventory system because their estimates have a significant influence on a country's total inventory of greenhouse gases in terms of the absolute level, the trend, or the level of uncertainty in emissions or removals." A key category analysis identifies priority source or sink categories for focusing efforts to improve overall Inventory quality. In addition, a qualitative review of key categories and non-key categories can also help identify additional source and sink categories to consider for improvement efforts, including reducing uncertainty.

Figure ES-16 presents the 2021 key categories identified by the Approach 1 level assessment, including the LULUCF sector. A level assessment using Approach 1 identifies all source and sink categories that cumulatively account for 95 percent of total (i.e., gross) emissions in a given year when assessed in descending order of absolute magnitude.

²⁶ See Chapter 4 "Methodological Choice and Identification of Key Categories" in IPCC (2006) and IPCC (2019). See https://www.ipcc-nggip.iges.or.jp/public/2009rf/pdf/1 Volume1/19R V1 Ch04 MethodChoice.pdf.

For a complete list of key categories and more information regarding the overall key category analysis, including approaches accounting for uncertainty and the influence of trends of individual source and sink categories, see the Introduction chapter, Section 1.5 – Key Categories and Annex 1.

Figure ES-16: 2021 Key Categories (Approach 1 including LULUCF)^a



^a For a complete list of key categories and detailed discussion of the underlying key category analysis, see Annex 1. Bars indicate key categories identified using Approach 1 level assessment including the LULUCF sector. The absolute values of net CO₂

emissions from LULUCF are presented in this figure but reported separately from gross emissions totals. Refer to Table ES-4 for a breakout of emissions and removals for LULUCF by source/sink category.

Quality Assurance and Quality Control (QA/QC)

The United States seeks continuous improvements to the quality, transparency, and usability of the *Inventory of U.S. Greenhouse Gas Emissions and Sinks*. To assist in these efforts, the United States implemented a systematic approach to QA/QC. The procedures followed for the Inventory have been formalized in accordance with the U.S. Inventory QA/QC plan, and the UNFCCC reporting guidelines and *2006 IPCC Guidelines*. The QA process includes expert and public reviews for the Inventory estimates and this report.

Box ES-3: Use of Ambient Measurements Systems for Validation of Emission Inventories

In following the UNFCCC requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and sinks presented in this report are organized by source and sink categories and calculated using internationally accepted methods provided by the IPCC. Several recent studies have estimated emissions at the national or regional level with estimated results that sometimes differ from EPA's estimate of emissions. EPA has engaged with researchers on how remote sensing, ambient measurement, and inverse modeling techniques for estimating greenhouse gas emissions could assist in improving the understanding of inventory estimates. In working with the research community to improve national greenhouse gas inventories, EPA follows guidance from the IPCC on the use of measurements and modeling to validate emission inventories. An area of particular interest in EPA's outreach efforts is how ambient measurement data can be used to assess estimates or potentially be incorporated into the Inventory in a manner consistent with this Inventory report's transparency of its calculation methodologies, and the ability of inverse modeling techniques to attribute emissions and removals from remote sensing to anthropogenic sources, as defined by the IPCC for this report, versus natural sources and sinks.

The 2019 Refinement to the IPCC 2006 Guidelines for National Greenhouse Gas Inventories (IPCC 2019) Volume 1 General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. The 2019 Refinement provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC [2019] Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC [2019] Volume 1, Chapter 6) given the technical complexity of such comparisons. Further, it identified fluorinated gases as particularly suitable for such comparisons. The 2019 Refinement makes this conclusion for fluorinated gases based on their lack of significant natural sources, their generally long atmospheric lifetimes, their well-known loss mechanisms, and the potential uncertainties in bottom-up inventory methods for some of their sources. Unlike emissions of CO₂, CH₄, and N₂O, emissions of fluorinated greenhouse gases are almost exclusively anthropogenic, meaning that the fluorinated greenhouse gase emission sources included in this Inventory account for the majority of the total U.S. emissions of these gases detectable in the atmosphere.

In this Inventory, EPA presents the results of two comparisons between fluorinated gas emissions inferred from atmospheric measurements and fluorinated gas emissions estimated based on bottom-up measurements and modeling. These comparisons, performed for HFCs and SF_6 respectively, are described under the QA/QC and Verification discussions in Chapter 4, Sections 4.24 Substitution of Ozone Depleting Substances and 4.25 Electrical Transmission and Distribution in the IPPU chapter of this report.

Consistent with the 2019 Refinement, a key element to facilitate such comparisons is a gridded prior inventory as an input to inverse modeling. To improve the ability to compare the national-level greenhouse gas inventory with measurement results that may be at other scales, a team at Harvard University along with EPA and other

²⁷ See http://www.ipcc-nggip.iges.or.jp/public/index.html.

²⁸ See http://www.ipcc-nggip.iges.or.jp/meeting/pdfiles/1003 Uncertainty%20meeting report.pdf.

coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1° x 0.1° spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization. The gridded inventory is designed to be consistent with the 1990 to 2014 U.S. EPA *Inventory of U.S. Greenhouse Gas Emissions and Sinks* estimates for the year 2012, which presents national totals for different source types.²⁹ This gridded inventory is consistent with the recommendations contained in two National Academies of Science reports examining greenhouse gas emissions data (National Research Council 2010; National Academies of Sciences, Engineering, and Medicine 2018).

Finally, in addition to use of atmospheric concentration measurement data for comparison with Inventory data, information from top-down studies is directly incorporated in the Natural Gas Systems calculations to quantify emissions from certain well blowout events.

Uncertainty Analysis of Emission and Sink Estimates

Uncertainty assessment is an essential element of a complete inventory of greenhouse gas emissions and removals because it helps to inform and prioritize inventory improvements. Recognizing the benefit of conducting an uncertainty analysis, the UNFCCC reporting guidelines follow the recommendations of the 2006 IPCC Guidelines (IPCC 2006), Volume 1, Chapter 3 and require that countries provide single estimates of uncertainty for source and sink categories. In addition to quantitative uncertainty assessments, a qualitative discussion of uncertainty is presented for each source and sink category identifying specific factors affecting the uncertainty surrounding the estimates provided in accordance with UNFCCC reporting guidelines. Some of the current estimates, such as those for CO₂ emissions from energy-related combustion activities, are considered to have low uncertainties. This is because the amount of CO₂ emitted from energy-related combustion activities is directly related to the amount of fuel consumed, the fraction of the fuel that is oxidized, and the carbon content of the fuel, and for the United States, the uncertainties associated with estimating those factors is relatively small. For some other categories of emissions and sinks, however, inherent variability or a lack of data increases the uncertainty or systematic error associated with the estimates presented. Finally, an analysis is conducted to assess uncertainties associated with the overall emissions, sinks and trends estimates. The overall uncertainty surrounding total net greenhouse gas emissions is estimated to be -5 to +6 percent in 1990 and -4 to +6 percent in 2021. When the LULUCF sector is excluded from the analysis the uncertainty is estimated to be -2 to +5 percent in 1990 and -2 to +6 percent in 2021.

²⁹ See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

ES-28 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

1. Introduction

This report presents an inventory of U.S. anthropogenic greenhouse gas emissions and sinks for the years 1990 through 2021 compiled by the United States government. A summary of these estimates is provided in Table 2-1 and Table 2-2 by gas and source category in the Trends in Greenhouse Gas Emissions chapter. The emission and sink estimates in these tables are presented on both a full mass basis and on a global warming potential (GWP)weighted basis¹ in order to show the relative contribution of each gas to global average radiative forcing. This report also discusses the methods and data used to calculate the emission and sink estimates.

In 1992, the United States signed and ratified the United Nations Framework Convention on Climate Change (UNFCCC). As stated in Article 2 of the UNFCCC, "The ultimate objective of this Convention and any related legal instruments that the Conference of the Parties may adopt is to achieve, in accordance with the relevant provisions of the Convention, stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a timeframe sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner." 2,3

As a signatory to the UNFCCC, consistent with Article 4⁴ and decisions at the First, Second, Fifth, and Nineteenth Conference of Parties, 5 the U.S. is committed to submitting a national inventory of anthropogenic sources and sinks of greenhouse gases to the UNFCCC by April 15 of each year. This Inventory provides a national estimate of sources and sinks for the United States, including all states, the District of Columbia and U.S. Territories. ⁶ The United States views this report, in conjunction with Common Reporting Format (CRF) reporting tables that accompany this report, as an opportunity to fulfill this annual commitment under the UNFCCC. Overall, this

¹ More information provided in the Global Warming Potentials section of this chapter on the use of IPCC Fifth Assessment Report (AR5) GWP values.

² The term "anthropogenic," in this context, refers to greenhouse gas emissions and removals that are a direct result of human activities or are the result of natural processes that have been affected by human activities (IPCC 2006).

³ Article 2 of the Framework Convention on Climate Change published by the UNEP/WMO Information Unit on Climate Change (UNEP/WMO 2000). See http://unfccc.int.

⁴ Article 4(1)(a) of the United Nations Framework Convention on Climate Change (also identified in Article 12) and subsequent decisions by the Conference of the Parties elaborated the role of Annex I Parties in preparing national inventories. Article 4 states "Parties to the Convention, by ratifying, shall develop, periodically update, publish and make available...national inventories of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol, using comparable methodologies..." See http://unfccc.int for more information.

⁵ United Nations Framework Convention on Climate Change, see Decision 7/CP.27 https://unfccc.int/sites/default/files/resource/cp2022 10a01 adv.pdf

⁶ U.S. Territories include American Samoa, Guam, Commonwealth of the Northern Mariana Islands, Puerto Rico, U.S. Virgin Islands, and other outlying U.S. Pacific Islands which are not permanently inhabited such as Wake Island. See https://www.usgs.gov/faqs/how-are-us-states-territories-and-commonwealths-designated-geographic-names-informationsystem?qt-news science products=0#qt-news science products. See more information on completeness in Section 1.8.

Inventory of anthropogenic greenhouse gas emissions and sinks provides a common and consistent mechanism through which Parties to the UNFCCC can compare the relative contribution of individual sources, gases, and nations to climate change. The structure of this report is consistent with the current UNFCCC Guidelines on Annual Inventories (UNFCCC 2014) for Parties included in Annex I of the Convention.

In 1988, preceding the creation of the UNFCCC, the World Meteorological Organization (WMO) and the United Nations Environment Programme (UNEP) jointly established the Intergovernmental Panel on Climate Change (IPCC). The role of the IPCC is to assess on a comprehensive, objective, open and transparent basis the scientific, technical and socio-economic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts and options for adaptation and mitigation (IPCC 2021). Under Working Group 1 of the IPCC, nearly 140 scientists and national experts from more than thirty countries collaborated in the creation of the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC/UNEP/OECD/IEA 1997) to ensure that the emission inventories submitted to the UNFCCC are consistent and comparable between nations. The IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories and the IPCC Good Practice Guidance for Land Use, Land-Use Change, and Forestry further expanded upon the methodologies in the Revised 1996 IPCC Guidelines. In 2006, the IPCC accepted the 2006 Guidelines for National Greenhouse Gas Inventories at its Twenty-Fifth Session (Mauritius, April 2006). The 2006 IPCC Guidelines built upon the previous bodies of work and include new sources and gases, "...as well as updates to the previously published methods whenever scientific and technical knowledge have improved since the previous guidelines were issued." The UNFCCC adopted the 2006 IPCC Guidelines as the standard methodological approach for Annex I countries and encouraged countries to gain experience in using the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands at the Nineteenth Conference of the Parties (Warsaw, November 11-23, 2013). The IPCC has recently released the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories to clarify and elaborate on the existing guidance in the 2006 IPCC Guidelines, along with providing updates to default values of emission factors and other parameters based on updated science. This report applies both the 2013 Supplement and updated guidance in the 2019 Refinement to improve accuracy and completeness of the Inventory. For more information on specific uses see Section 1.4 of this chapter on Methodology and Data Sources.

Box 1-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program

In following the UNFCCC requirement under Article 4.1 and decision 24/CP.19 to develop and submit annual national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the IPCC in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines) and where appropriate, its supplements and refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations reporting their inventories to the UNFCCC ensures that the estimates are comparable. The presentation of emissions and removals provided in this Inventory does not preclude alternative examinations, but rather this Inventory presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals.

EPA also collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP). The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject carbon dioxide

1-2 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁷ On October 30, 2009, the EPA promulgated a rule requiring annual reporting of greenhouse gas data from large greenhouse gas emissions sources in the United States. Implementation of the rule, codified at 40 CFR Part 98, is referred to as EPA's Greenhouse Gas Reporting Program (GHGRP).

(CO₂) underground for sequestration or other reasons and requires reporting by over 8,000 sources or suppliers in 41 industrial categories.⁸ Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases. In general, the threshold for reporting is 25,000 metric tons or more of CO₂ Eq. per year. Facilities in most source categories subject to GHGRP began reporting for the 2010 reporting year while additional types of industrial operations began reporting for reporting year 2011. While the GHGRP does not provide full coverage of total annual U.S. greenhouse gas emissions and sinks (e.g., the GHGRP excludes emissions from the agricultural, land use, and forestry sectors), it is an important input to the calculations of national-level emissions in the Inventory.

Data presented in this Inventory report and EPA's GHGRP are complementary. The GHGRP dataset continues to be an important resource for the Inventory, providing not only annual emissions information, but also other annual information such as activity data and emission factors that can improve and refine national emission estimates and trends over time. Methodologies used in EPA's GHGRP are consistent with the 2006 IPCC Guidelines (e.g., higher tier methods). GHGRP data also allow EPA to disaggregate national inventory estimates in new ways that can highlight differences across regions and sub-categories of emissions, along with enhancing the application of QA/QC procedures and assessment of uncertainties. EPA uses annual GHGRP data in a number of categories to improve the national estimates presented in this Inventory consistent with IPCC methodological guidance. See Annex 9 for more information on specific uses of GHGRP data in the Inventory (e.g., natural gas systems).

1.1 Background Information

Science

For over the past 200 years, the burning of fossil fuels such as coal and oil, along with deforestation, land-use changes, and other activities have caused the concentrations of heat-trapping "greenhouse gases" to increase significantly in our atmosphere (IPCC 2021). These gases in the atmosphere absorb some of the energy being radiated from the surface of the Earth that would otherwise be lost to space, essentially acting like a blanket that makes the Earth's surface warmer than it would be otherwise.

Greenhouse gases are necessary to life as we know it. Without greenhouse gases to create the natural heat-trapping properties of the atmosphere, the planet's surface would be about 60 degrees Fahrenheit cooler than present (USGCRP 2017). Carbon dioxide is also necessary for plant growth. With emissions from biological and geological sources, there is a natural level of greenhouse gases that is maintained in the atmosphere. Human emissions of greenhouse gases and subsequent changes in atmospheric concentrations alter the balance of energy transfers between space and the earth system (IPCC 2021). A gauge of these changes is called radiative forcing, which is a measure of a substance's total net effect on the global energy balance for which a positive number represents a warming effect, and a negative number represents a cooling effect (IPCC 2021). IPCC concluded in its most recent scientific assessment report that it is "unequivocal that human influence has warmed the atmosphere, ocean and land" (IPCC 2021).

As concentrations of greenhouse gases continue to increase in from man-made sources, the Earth's temperature is climbing above past levels. The Earth's average land and ocean surface temperature has increased by about 2.0 degrees Fahrenheit from the 1850 to 1900 period to the decade of 2011 to 2020 (IPCC 2021). The last four decades have each been the warmest decade successively at the Earth's surface since at least 1850 (IPCC 2021). Other aspects of the climate are also changing, such as rainfall patterns, snow and ice cover, and sea level. If greenhouse gas concentrations continue to increase, climate models predict that the average temperature at the Earth's

Introduction

⁸ See http://www.epa.gov/ghgreporting and http://ghgdata.epa.gov/ghgp/main.do.

surface is likely to increase by up to 8.3 degrees Fahrenheit above 2011 to 2020 levels by the end of this century, depending on future emissions and the responsiveness of the climate system (IPCC 2021), though the lowest emission scenario would limit future warming to an additional 0.5 degrees (best estimate).

For further information on greenhouse gases, radiative forcing, and implications for climate change, see the recent scientific assessment reports from the IPCC, ⁹ the U.S. Global Change Research Program (USGCRP), ¹⁰ and the National Academies of Sciences, Engineering, and Medicine (NAS). 11

Greenhouse Gases

Although the Earth's atmosphere consists mainly of oxygen and nitrogen, neither plays a significant role in enhancing the greenhouse effect because both are essentially transparent to terrestrial radiation. The greenhouse effect is primarily a function of the concentration of water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N2O), and other trace gases in the atmosphere that absorb the terrestrial radiation leaving the surface of the Earth (IPCC 2021).

Naturally occurring greenhouse gases include water vapor, CO₂, CH₄, N₂O, and ozone (O₃). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also greenhouse gases, but they are, for the most part, solely a product of industrial activities. Chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) are halocarbons that contain chlorine, while halocarbons that contain bromine are referred to as bromofluorocarbons (i.e., halons). As stratospheric ozone depleting substances, CFCs, HCFCs, and halons are covered under the Montreal Protocol on Substances that Deplete the Ozone Layer. The UNFCCC defers to this earlier international treaty. Consequently, Parties to the UNFCCC are not required to include these gases in national greenhouse gas inventories. 12 Some other fluorine-containing halogenated substances hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₀), and nitrogen trifluoride (NF₃)—do not deplete stratospheric ozone but are potent greenhouse gases. These latter substances are addressed by the UNFCCC and accounted for in national greenhouse gas inventories.

There are also several other substances that influence the global radiation budget but are short-lived and therefore not well-mixed, leading to spatially variable radiative forcing effects. These substances include carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and tropospheric (ground level) ozone (O₃). Tropospheric ozone is formed from chemical reactions in the atmosphere of precursor pollutants, which include volatile organic compounds (VOCs, including CH₄) and nitrogen oxides (NO_x), in the presence of ultraviolet light (sunlight).

Aerosols are extremely small particles or liquid droplets suspended in the Earth's atmosphere that are often composed of sulfur compounds, carbonaceous combustion products (e.g., black carbon), crustal materials (e.g., dust) and other human-induced pollutants. They can affect the absorptive characteristics of the atmosphere (e.g., scattering incoming sunlight away from the Earth's surface, or, in the case of black carbon, absorb sunlight) and can play a role in affecting cloud formation and lifetime, as well as the radiative forcing of clouds and precipitation patterns.

Carbon dioxide, CH₄, and N₂O are continuously emitted to and removed from the atmosphere by natural processes on Earth. Anthropogenic activities (such as fossil fuel combustion, cement production, land-use, land-use change, and forestry, agriculture, or waste management), however, can cause additional quantities of these and other greenhouse gases to be emitted or sequestered, thereby changing their global average atmospheric

⁹ See https://www.ipcc.ch/report/ar6/wg1/.

¹⁰ See https://nca2018.globalchange.gov/.

¹¹ See https://www.nationalacademies.org/topics/climate.

¹² Emissions estimates of CFCs, HCFCs, halons and other ozone-depleting substances are included in this document for informational purposes.

concentrations. Natural activities such as respiration by plants or animals and seasonal cycles of plant growth and decay are examples of processes that only cycle carbon or nitrogen between the atmosphere and organic biomass. Such processes, except when directly or indirectly perturbed out of equilibrium by anthropogenic activities, generally do not alter average atmospheric greenhouse gas concentrations over decadal timeframes. Climatic changes resulting from anthropogenic activities, however, could have positive or negative feedback effects on these natural systems. Atmospheric concentrations of these gases, along with their rates of growth and atmospheric lifetimes, are presented in Table 1-1.

Table 1-1: Global Atmospheric Concentration, Rate of Concentration Change, and Atmospheric Lifetime of Selected Greenhouse Gases

Atmospheric Variable	CO ₂	CH ₄	N ₂ O	SF ₆	CF ₄
Pre-industrial atmospheric concentration	280 ppm	0.730 ppm	0.270 ppm	0 ppt	40 ppt
Atmospheric concentration	416 ppm ^a	1.895 ppm ^b	0.334 ppm ^c	10.63 ppt ^d	85.5 ppt ^e
Rate of concentration change	2.38 ppm/yrf	18.05 ppb/yrf,g	1.30 ppb/yrf	0.39 ppt/yrf	0.81 ppt/yrf
Atmospheric lifetime (years)	See footnote ^h	11.8	109 ⁱ	About 1,000 ^j	50,000

^a The atmospheric CO₂ concentration is the 2021 annual average at the Mauna Loa, HI station (NOAA/ESRL 2023a). The global atmospheric CO₂ concentration, computed using an average of sampling sites across the world, was 415 ppm in 2021.

A brief description of each greenhouse gas, its sources, and its role in the atmosphere is given below. The following section then explains the concept of GWPs, which are assigned to individual gases as a measure of their relative average global radiative forcing effect.

Water Vapor (H₂O). Water vapor is the largest contributor to the natural greenhouse effect. Water vapor is fundamentally different from other greenhouse gases in that it can condense and rain out when it reaches high concentrations, and the total amount of water vapor in the atmosphere is in part a function of the Earth's temperature. While some human activities such as evaporation from irrigated crops or power plant cooling release water vapor into the air, these activities have been determined to have a negligible effect on global climate (IPCC 2021). The lifetime of water vapor in the troposphere is on the order of 10 days. Water vapor can also contribute to cloud formation, and clouds can have both warming and cooling effects by either trapping or reflecting heat. Because of the relationship between water vapor levels and temperature, water vapor and clouds serve as a feedback to climate change, such that for any given increase in other greenhouse gases, the total warming is greater than would happen in the absence of water vapor. Aircraft emissions of water vapor can create contrails, which may also develop into contrail-induced cirrus clouds, with complex regional and temporal net radiative forcing effects that currently have a low level of scientific certainty (IPCC 2021).

Carbon Dioxide (CO_2). In nature, carbon is cycled between various atmospheric, oceanic, land biotic, marine biotic, and mineral reservoirs. The largest fluxes occur between the atmosphere and terrestrial biota, and between the atmosphere and surface water of the oceans. In the atmosphere, carbon predominantly exists in its oxidized form

^b The values presented are global 2021 annual average mole fractions (NOAA/ESRL 2023b).

^c The values presented are global 2021 annual average mole fractions (NOAA/ESRL 2023c).

^d The values presented are global 2021 annual average mole fractions (NOAA/ESRL 2023d).

^e The 2019 CF₄ global mean atmospheric concentration is from the Advanced Global Atmospheric Gases Experiment (IPCC 2021).

 $^{^{\}rm f}$ The rate of concentration change for CO₂ is an average of the rates from 2007 through 2021 and has fluctuated between 1.5 to 3.0 ppm per year over this period (NOAA/ESRL 2023a). The rate of concentration change for CH₄, N₂O, and SF₆, is the average rate of change between 2007 and 2021 (NOAA/ESRL 2023b; NOAA/ESRL 2023c; NOAA/ESRL 2023d). The rate of concentration change for CF₄ is the average rate of change between 2011 and 2019 (IPCC 2021).

^g The growth rate for atmospheric CH₄ decreased from over 10 ppb/year in the 1980s to nearly zero in the early 2000s; recently, the growth rate has been about 18.21 ppb/year (NOAA/ESRL 2023b).

^h For a given amount of CO₂ emitted, some fraction of the atmospheric increase in concentration is quickly absorbed by the oceans and terrestrial vegetation, some fraction of the atmospheric increase will only slowly decrease over a number of years, and a small portion of the increase will remain for many centuries or more.

¹ This lifetime has been defined as an "adjustment time" that takes into account the indirect effect of the gas on its own residence time.

^j The lifetime for SF₆ was revised from 3,200 years to about 1,000 years based on recent studies (IPCC 2021). Source: Pre-industrial atmospheric concentrations and atmospheric lifetimes for CH₄, N_2O , SF₆, and CF₄ are from IPCC (2021).

as CO₂. Atmospheric CO₂ is part of this global carbon cycle, and therefore its fate is a complex function of geochemical and biological processes. Carbon dioxide concentrations in the atmosphere increased from approximately 280 parts per million by volume (ppmv) in pre-industrial times to 416 ppmv in 2021, a 48 percent increase (IPCC 2021; NOAA/ESRL 2023a). 13,14 The IPCC states that "Observed increases in well-mixed greenhouse gas (GHG) concentrations since around 1750 are unequivocally caused by human activities" (IPCC 2021). The predominant source of anthropogenic CO₂ emissions is the combustion of fossil fuels. Forest clearing, other biomass burning, and some non-energy production processes (e.g., cement production) also emit notable quantities of CO2. In its Sixth Assessment Report, the IPCC determined that of the 2.0 degrees of observed warming, the best estimate is that 1.9 degrees of that are due to human influence, with elevated CO₂ concentrations being the most important contributor to that warming (IPCC 2021).

Methane (CH4). Methane is primarily produced through anaerobic decomposition of organic matter in biological systems. Agricultural processes such as wetland rice cultivation, enteric fermentation in animals, and the decomposition of animal wastes emit CH₄, as does the decomposition of municipal solid wastes and treatment of wastewater. Methane is also emitted during the production and distribution of natural gas and petroleum, and is released as a byproduct of coal mining and incomplete fossil fuel combustion. Atmospheric concentrations of CH₄ have increased by about 162 percent since 1750, from a pre-industrial value of about 730 ppb to 1,895 ppb in 2021¹⁵ although the rate of increase decreased to near zero in the early 2000s, and has recently increased again to about 18.05 ppb/year. The IPCC has estimated that about half of the current CH4 flux to the atmosphere (and the entirety of the increase in concentration) is anthropogenic, from human activities such as agriculture, fossil fuel production and use, and waste disposal (IPCC 2021).

Methane is primarily removed from the atmosphere through a reaction with the hydroxyl radical (OH) and is ultimately converted to CO₂. Minor removal processes also include reaction with chlorine in the marine boundary layer, a soil sink, and stratospheric reactions. Increasing emissions of CH4 reduce the concentration of OH, a feedback that increases the atmospheric lifetime of CH₄ (IPCC 2021). Methane's reactions in the atmosphere also lead to production of tropospheric ozone and stratospheric water vapor, both of which also contribute to climate change. Tropospheric ozone also has negative effects on human health and plant productivity.

Nitrous Oxide (N2O). Anthropogenic sources of N2O emissions include agricultural soils, especially production of nitrogen-fixing crops and forages, the use of synthetic and manure fertilizers, and manure deposition by livestock; fossil fuel combustion, especially from mobile combustion; adipic (nylon) and nitric acid production; wastewater treatment and waste incineration; and biomass burning. The atmospheric concentration of N₂O has increased by 24 percent since 1750, from a pre-industrial value of about 270 ppb to 334 ppb in 2021, ¹⁶ a concentration that has not been exceeded during at least the last 800 thousand years. Nitrous oxide is primarily removed from the atmosphere by the photolytic action of sunlight in the stratosphere (IPCC 2021).

Ozone (O_3) . Ozone is present in both the upper stratosphere, 17 where it shields the Earth from harmful levels of ultraviolet radiation, and at lower concentrations in the troposphere, 18 where it is the main component of

¹³ The pre-industrial period is considered as the time preceding the year 1750 (IPCC 2013).

¹⁴ Carbon dioxide concentrations during the last 1,000 years of the pre-industrial period (i.e., 750 to 1750), a time of relative climate stability, fluctuated by about ± 10 ppmv around 280 ppmv (IPCC 2013).

¹⁵ This value is the global 2021 annual average mole fraction (NOAA/ESRL 2023b).

¹⁶ This value is the global 2021 annual average (NOAA/ESRL 2023c).

 $^{^{17}}$ The stratosphere is the layer from the troposphere up to roughly 50 kilometers. In the lower regions the temperature is nearly constant but in the upper layer the temperature increases rapidly because of sunlight absorption by the ozone layer. The ozone-layer is the part of the stratosphere from 19 kilometers up to 48 kilometers where the concentration of ozone reaches up to 10 parts per million.

 $^{^{18}}$ The troposphere is the layer from the ground up to 11 kilometers near the poles and up to 16 kilometers in equatorial regions (i.e., the lowest layer of the atmosphere where people live). It contains roughly 80 percent of the mass of all gases in the atmosphere and is the site for most weather processes, including most of the water vapor and clouds.

anthropogenic photochemical "smog." During the last two decades, emissions of anthropogenic chlorine and bromine-containing halocarbons, such as CFCs, have depleted stratospheric ozone concentrations. This loss of ozone in the stratosphere has resulted in negative radiative forcing, representing an indirect effect of anthropogenic emissions of chlorine and bromine compounds (IPCC 2021). The depletion of stratospheric ozone and its radiative forcing remained relatively unchanged since 2000 for the last two decades and is starting to decline; recovery is expected to occur shortly after the middle of the twenty-first century (WMO/UNEP 2018).

The past increase in tropospheric ozone, which is also a greenhouse gas, is estimated to provide the third largest increase in direct radiative forcing since the pre-industrial era, behind CO_2 and CH_4 . Tropospheric ozone is produced from complex chemical reactions of volatile organic compounds (including CH_4) mixing with NO_x in the presence of sunlight. The tropospheric concentrations of ozone and these other pollutants are short-lived and, therefore, spatially variable (IPCC 2021).

Halocarbons, Sulfur Hexafluoride, and Nitrogen Trifluoride. Halocarbons are, for the most part, man-made chemicals that have direct radiative forcing effects and could also have an indirect effect. Halocarbons that contain chlorine (CFCs, HCFCs, methyl chloroform, and carbon tetrachloride) and bromine (halons, methyl bromide, and hydrobromofluorocarbons) result in stratospheric ozone depletion and are therefore controlled under the Montreal Protocol on Substances that Deplete the Ozone Layer. Although most CFCs and HCFCs are potent global warming gases, their net radiative forcing effect on the atmosphere is reduced because they cause stratospheric ozone depletion, which itself is a greenhouse gas but which also shields the Earth from harmful levels of ultraviolet radiation. Under the Montreal Protocol, the United States phased out the production and importation of halons by 1994 and of CFCs by 1996. Under the Copenhagen Amendments to the Protocol, a cap was placed on the production and importation of HCFCs by non-Article 5 countries, including the United States, ¹⁹ beginning in 1996, and then followed by intermediate requirements and a complete phase-out by the year 2030. While ozone depleting gases covered under the Montreal Protocol and its Amendments are not covered by the UNFCCC, they are reported in this Inventory under Annex 6.2 for informational purposes.

Hydrofluorocarbons, PFCs, SF₆, and NF₃ are not ozone depleting substances. The most common HFCs are, however, powerful greenhouse gases. Hydrofluorocarbons are primarily used as replacements for ozone depleting substances but also emitted as a byproduct of the HCFC-22 (chlorodifluoromethane) manufacturing process. Currently, they have a small aggregate radiative forcing impact, but it is anticipated that without further controls their contribution to overall radiative forcing will increase, the ERF (effective radiative forcing) of halogenated gases increased by 3.5 percent between 2011 and 2019 primarily due to a decrease in atmospheric mixing-ratios of CFCs and an increase in their replacements (IPCC 2021). On December 27, 2020, the American Innovation and Manufacturing (AIM) Act was enacted by Congress and which gives EPA authority to phase down HFC production and consumption (i.e., production plus import, minus export), through an allowance allocation program, promulgate certain regulations for purposes of maximizing reclamation and minimizing releases of HFCs and their substitutes from equipment, and facilitating the transition to next-generation technologies through sector-based restrictions, which will lead to lower HFC emissions over time. Perfluorocarbons, SF₆, and NF₃ are predominantly emitted from various industrial processes including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. Currently, the radiative forcing impact of PFCs, SF₆, and NF₃ is also small, but they have a significant growth rate, extremely long atmospheric lifetimes, and are strong absorbers of infrared radiation, and therefore have the potential to influence climate far into the future (IPCC 2021).

Carbon Monoxide (CO). Carbon monoxide has an indirect radiative forcing effect by elevating concentrations of CH₄ and tropospheric ozone through chemical reactions with other atmospheric constituents (e.g., the hydroxyl radical, OH) that would otherwise assist in destroying CH₄ and tropospheric ozone. Carbon monoxide is created when

Introduction

¹⁹ Article 5 of the Montreal Protocol covers several groups of countries, especially developing countries, with low consumption rates of ozone depleting substances. Developing countries with per capita consumption of less than 0.3 kg of certain ozone depleting substances (weighted by their ozone depleting potential) receive financial assistance and a grace period of ten additional years in the phase-out of ozone depleting substances.

carbon-containing fuels are burned incompletely. Through natural processes in the atmosphere, it is eventually oxidized to CO₂. Carbon monoxide concentrations are both short-lived in the atmosphere and spatially variable.

Nitrogen Oxides (NOx). The primary climate change effects of nitrogen oxides (i.e., NO and NO2) are indirect. Warming effects can occur due to reactions leading to the formation of ozone in the troposphere, but cooling effects can occur due to the role of NO_x as a precursor to nitrate particles (i.e., aerosols) and due to destruction of stratospheric ozone when emitted from very high-altitude aircraft.²⁰ Additionally, NO_x emissions are also likely to decrease CH₄ concentrations, thus having a negative radiative forcing effect (IPCC 2021). Nitrogen oxides are created from lightning, soil microbial activity, biomass burning (both natural and anthropogenic fires) fuel combustion, and, in the stratosphere, from the photo-degradation of N₂O. Concentrations of NO_x are both relatively short-lived in the atmosphere and spatially variable.

Non-methane Volatile Organic Compounds (NMVOCs). Non-methane volatile organic compounds include substances such as propane, butane, and ethane. These compounds participate, along with NOx, in the formation of tropospheric ozone and other photochemical oxidants. NMVOCs are emitted primarily from transportation and industrial processes, as well as biomass burning and non-industrial consumption of organic solvents. Concentrations of NMVOCs tend to be both short-lived in the atmosphere and spatially variable.

Aerosols. Aerosols are extremely small particles or liquid droplets found in the atmosphere that are either directly emitted into or are created through chemical reactions in the Earth's atmosphere. Aerosols or their chemical precursors can be emitted by natural events such as dust storms, biogenic or volcanic activity, or by anthropogenic processes such as transportation, coal combustion, cement manufacturing, waste incineration, or biomass burning. Various categories of aerosols exist from both natural and anthropogenic sources, such as soil dust, sea salt, biogenic aerosols, sulfates, nitrates, volcanic aerosols, industrial dust, and carbonaceous ²¹ aerosols (e.g., black carbon, organic carbon). Aerosols can be removed from the atmosphere relatively rapidly by precipitation or through more complex processes under dry conditions.

Aerosols affect radiative forcing differently than greenhouse gases. Their radiative effects occur through direct and indirect mechanisms: directly by scattering and absorbing solar radiation (and to a lesser extent scattering, absorption, and emission of terrestrial radiation); and indirectly by increasing cloud droplets and ice crystals that modify the formation, precipitation efficiency, and radiative properties of clouds (IPCC 2021). Despite advances in understanding of cloud-aerosol interactions, the contribution of aerosols to radiative forcing are difficult to quantify because aerosols generally have short atmospheric lifetimes, and have number concentrations, size distributions, and compositions that vary regionally, spatially, and temporally (IPCC 2021).

The net effect of aerosols on the Earth's radiative forcing is believed to be negative (i.e., net cooling effect on the climate). In fact, aerosols contributed a cooling influence of up to 1.4 degrees, offsetting a substantial portion of greenhouse gas warming (IPCC 2021). Because aerosols remain in the atmosphere for only days to weeks, their concentrations respond rapidly to changes in emissions.²² Not all aerosols have a cooling effect. Current research suggests that another constituent of aerosols, black carbon, has a positive radiative forcing by heating the Earth's atmosphere and causing surface warming when deposited on ice and snow (IPCC 2021). Black carbon also influences cloud development, but the direction and magnitude of this forcing is an area of active research.

1-8 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

²⁰ NO_x emissions injected higher in the stratosphere, primarily from fuel combustion emissions from high altitude supersonic aircraft, can lead to stratospheric ozone depletion.

²¹ Carbonaceous aerosols are aerosols that are comprised mainly of organic substances and forms of black carbon (or soot) (IPCC 2013).

²² Volcanic activity can inject significant quantities of aerosol producing sulfur dioxide and other sulfur compounds into the stratosphere, which can result in a longer lasting negative forcing effect (i.e., a few years) (IPCC 2013).

Global Warming Potentials

A global warming potential (GWP) is a quantified measure of the globally averaged relative radiative forcing impacts of a particular greenhouse gas (see Table 1-2). It is defined as the accumulated radiative forcing within a specific time horizon caused by emitting 1 kilogram (kg) of the gas, relative to that of the reference gas CO2 (IPCC 2021). Direct radiative effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations involving the original gas produce a gas or gases that are greenhouse gases, or when a gas influences other radiatively important processes such as the atmospheric lifetimes of other gases. The reference gas used is CO₂, and therefore GWP-weighted emissions are measured in million metric tons of CO₂ equivalent (MMT CO₂ Eq.). ²³ The relationship between kilotons (kt) of a gas and MMT CO₂ Eq. can be expressed as follows:

Equation 1-1: Calculating CO₂ Equivalent Emissions

MMT CO₂ Eq. = (kt of gas) × (GWP) ×
$$\left(\frac{\text{MMT}}{1,000 \text{ kt}}\right)$$

where.

MMT CO₂ Eq. = Million metric tons of CO₂ equivalent

kt = kilotons (equivalent to a thousand metric tons)

GWP = Global warming potential MMT = Million metric tons

GWP values allow for a comparison of the impacts of emissions and reductions of different gases. According to the IPCC, GWPs typically have an uncertainty of ±40 percent.

All estimates are provided throughout the report in both MMT CO₂ equivalents and unweighted units. Recent decisions under the UNFCCC require Parties to use 100-year GWP values from the IPCC Fifth Assessment Report (AR5) for calculating CO₂-equivalent emissions in their national reporting by the end of 2024.

...Decides that, until it adopts a further decision on the matter, the global warming potential values used by Parties in their reporting under the Convention to calculate the carbon dioxide equivalence of anthropogenic greenhouse gas emissions by sources and removals by sinks shall be based on the effects of greenhouse gases over a 100-year time horizon as listed in table 8.A.1 in appendix 8.A to the contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, ²⁴ excluding the value for fossil methane. ²⁵

This reflects updated science and ensures that national greenhouse gas inventories reported by all nations are comparable. In preparation for upcoming UNFCCC requirement, 26 this report reflects CO₂-equivalent greenhouse gas totals using 100-year AR5 GWP values. A comparison of emission values with the previously used 100-year GWP values from IPCC Fourth Assessment Report (AR4) (IPCC 2007), and the IPCC Sixth Assessment Report (AR6)

²³ Carbon comprises 12/44ths of carbon dioxide by weight.

²⁴ Intergovernmental Panel on Climate Change. 2013. *Climate Change 2013: The Physical Science Basis*. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. TF Stocker, D Qin, G-K Plattner, et al. (eds.). Cambridge and New York: Cambridge University Press. Available at http://www.ipcc.ch/report/ar5/wg1.

²⁵ See paragraphs 1 and 2 of the decision on common metrics adopted at the 27th UNFCCC Conference of Parties (COP27), available online at https://unfccc.int/sites/default/files/resource/cp2022 10a01 adv.pdf. The UNFCCC reporting guidelines require use of the 100-year GWPs listed in table 8.A.1 in Annex 8.A of Chapter 8 of the Fifth Assessment Report (AR5) of the Intergovernmental Panel on Climate Change, excluding the value for fossil methane. United Nations Framework Convention on Climate Change, see https://unfccc.int/sites/default/files/resource/cp2022 10a01 adv.pdf.

²⁶ See Annex to decision 18/CMA.1, available online at https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf

(IPCC 2021) values can be found in Annex 6.1 of this report. The 100-year GWP values used in this report are listed below in Table 1-2.

Greenhouse gases with relatively long atmospheric lifetimes (e.g., CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃) tend to be evenly distributed throughout the atmosphere, and consequently global average concentrations can be determined. The short-lived gases such as water vapor, carbon monoxide, tropospheric ozone, ozone precursors (e.g., NO_x, and NMVOCs), and tropospheric aerosols (e.g., SO₂ products and carbonaceous particles), however, vary regionally, and consequently it is difficult to quantify their global radiative forcing impacts. Parties to the UNFCCC have not agreed upon GWP values for these gases that are short-lived and spatially inhomogeneous in the atmosphere.

Table 1-2: Global Warming Potentials and Atmospheric Lifetimes (Years) Used in this Report

Gas	Atmospheric Lifetime	GWP ^a
CO ₂	See footnote ^b	1
CH ₄ ^c	12.4	28
N_2O	121	265
HFC-23	222	12,400
HFC-32	5.2	677
HFC-41 ^d	2.8	116
HFC-125	28.2	3,170
HFC-134a	13.4	1,300
HFC-143a	47.1	4,800
HFC-152a	1.5	138
HFC-227ea	38.9	3,350
HFC-236fa	242	8,060
CF ₄	50,000	6,630
C_2F_6	10,000	11,100
C ₃ F ₈	2,600	8,900
c-C ₄ F ₈	3,200	9,540
SF ₆	3,200	23,500
NF ₃	500	16,100
Other Fluorinated Gases		See Annex 6

^a 100-year time horizon.

Source: IPCC (2013).

Box 1-2: The IPCC Sixth Assessment Report and Global Warming Potentials

In 2021, the IPCC published its *Sixth Assessment Report* (AR6), which updated its comprehensive scientific assessment of climate change. Within the AR6 report, the GWP values of gases were revised relative to previous IPCC reports, namely the IPCC *Second Assessment Report* (SAR) (IPCC 1996), the IPCC *Third Assessment Report* (TAR) (IPCC 2001), the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007), and the IPCC *Fifth Assessment Report* (AR5) (IPCC 2014). Although the AR5 GWP values are used throughout this report, consistent with UNFCCC reporting requirements, it is straight-forward to review the changes to the GWP values and their impact on

 $^{^{\}rm b}$ For a given amount of CO₂ emitted, some fraction of the atmospheric increase in concentration is quickly absorbed by the oceans and terrestrial vegetation, some fraction of the atmospheric increase will only slowly decrease over a number of years, and a small portion of the increase will remain for many centuries or more.

^c The GWP of CH₄ includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

d See Table A-1 of 40 CFR Part 98

estimates of the total GWP-weighted emissions of the United States. In the AR6, the IPCC used more recent estimates of the atmospheric lifetimes and radiative efficiencies of some gases and updated background concentrations. The AR6 now includes climate-carbon feedback effects for non-CO2 gases, improving the consistency between treatment of CO₂ and non-CO₂ gases. Indirect effects of gases on other atmospheric constituents (such as the effect of methane on ozone) have also been updated to match more recent science.

Table 1-3 presents the new GWP values, relative to those presented in the AR4 and AR5, using the 100-year time horizon common to UNFCCC reporting. For consistency with international reporting standards under the UNFCCC, official emission estimates are reported by the United States using AR4 100-year GWP values, as required by the 2013 revision to the UNFCCC reporting guidelines for national inventories. ²⁷ Updated reporting guidelines under the Paris Agreement which require the United States and other countries to shift to use of the IPCC Fifth Assessment Report (AR5) (IPCC 2013) 100-year GWP values (without feedbacks) take effect for national inventory reporting in 2024.²⁸ All estimates provided throughout this report are also presented in unweighted units. For informational purposes, emission estimates that use 100-year GWPs from other recent IPCC Assessment Reports are presented in detail in Annex 6.1 of this report.

Table 1-3: Comparison of 100-Year GWP values

	100-	Co	mparisons to A	AR5			
			AR5 with			AR5 with	
Gas	AR4	AR5 ^a	feedbacks ^b	AR6c	AR4	feedbacks ^b	AR6 ^c
CO ₂	1	1	1	1	NC	NC	NC
CH ₄ ^d	25	28	34	27	(3)	6	1
N_2O	298	265	298	273	33	33	8
HFC-23	14,800	12,400	13,856	14,600	2,400	1,456	2,200
HFC-32	675	677	817	771	(2)	140	94
HFC-41	92	116	141	135	(24)	25	19
HFC-125	3,500	3,170	3,691	3,740	330	521	570
HFC-134a	1,430	1,300	1,549	1,530	130	249	230
HFC-143a	4,470	4,800	5,508	5,810	(330)	708	1,010
HFC-152a	124	138	167	164	(14)	29	26
HFC-227ea	3,220	3,350	3,860	3,600	(130)	510	250
HFC-236fa	9,810	8,060	8,998	8,690	1,750	938	630
CF ₄	7,390	6,630	7,349	7,380	760	719	750
C_2F_6	12,200	11,100	12,340	12,400	1,100	1,240	1,300
C ₃ F ₈	8,830	8,900	9,878	9,290	(70)	978	390
c-C ₄ F ₈	10,300	9,540	10,592	10,200	(760)	1,052	660
SF ₆	22,800	23,500	26,087	24,300	700	2,587	800
NF ₃	17,200	16,100	17,885	17,400	(1,100)	1,785	1,300

NC (No Change)

Sources: IPCC (2021), IPCC (2013), IPCC (2007), IPCC (2001), IPCC (1996).

^a The GWP values in this column reflect values used in this report from AR5 excluding climate-carbon feedbacks and the value for fossil methane.

^b The GWP values in this column are from the AR5 report but include climate-carbon feedbacks for the non-CO₂ gases in order to be consistent with the approach used in calculating the CO₂ lifetime.

^c The GWP values in this column are from the AR6 report.

^d The GWP of CH₄ includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. Including the indirect effect due to the production of CO2 resulting from methane oxidation would lead to an increase in AR5 methane GWP values by 2 for fossil methane and is not shown in this table. Note: Parentheses indicate negative values.

²⁷ See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

²⁸ See https://unfccc.int/process-and-meetings/transparency-and-reporting/reporting-and-review-under-the-paris-agreement.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 107 of 1050 PageID 3555

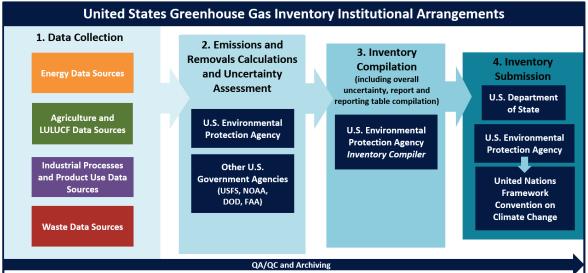
1.2 National Inventory Arrangements

The U.S. Environmental Protection Agency (EPA), in cooperation with other U.S. government agencies, prepares the *Inventory of U.S. Greenhouse Gas Emissions and Sinks*. A wide range of agencies and individuals are involved in supplying data to, planning methodological approaches and improvements, reviewing, or preparing portions of the Inventory—including federal and state government authorities, research and academic institutions, industry associations, and private consultants.

Within EPA, the Office of Atmospheric Protection (OAP) is the lead office responsible for the emission and removal calculations provided in the Inventory, as well as the completion of the National Inventory Report and the Common Reporting Format (CRF) tables. EPA's Office of Transportation and Air Quality (OTAQ) and Office of Research and Development (ORD) are also involved in calculating emissions and removals for the Inventory. The U.S. Department of State (DOS) serves as the overall national focal point to the UNFCCC, and EPA's OAP serves as the National Inventory Focal Point for this report, including responding to technical questions and comments on the U.S. Inventory. EPA staff coordinate the annual methodological choice, activity data collection, emission and removal calculations, uncertainty assessment, QA/QC processes, and improvement planning at the individual source and sink category level. EPA's inventory coordinator manages overall compilation of the entire Inventory into the proper reporting format for submission to the UNFCCC, and is responsible for the synthesis of information and for the consistent application of cross-cutting IPCC good practice across the Inventory.

Several other government agencies contribute to the collection and analysis of the underlying activity data used in the Inventory calculations via formal (e.g., interagency agreements) and informal relationships, in addition to the calculation of estimates integrated in the report (e.g., U.S. Department of Agriculture's U.S. Forest Service and Agricultural Service, National Oceanic and Atmospheric Administration, Federal Aviation Administration, and Department of Defense). Other U.S. agencies provide official data for use in the Inventory. The U.S. Department of Energy's Energy Information Administration provides national fuel consumption data and the U.S. Department of Defense provides data on military fuel consumption and use of bunker fuels. Other U.S. agencies providing activity data for use in EPA's emission calculations include: the U.S. Department of Agriculture, National Oceanic and Atmospheric Administration, the U.S. Geological Survey, the Federal Highway Administration, the Department of Transportation, the Bureau of Transportation Statistics, the Department of Commerce, and the Federal Aviation Administration. Academic and research centers also provide activity data and calculations to EPA, as well as individual companies participating in voluntary outreach efforts with EPA. Finally, EPA as the National Inventory Focal Point, in coordination with the U.S. Department of State, officially submits the Inventory to the UNFCCC each April.

Figure 1-1: National Inventory Arrangements and Process Diagram



Overview of Inventory Data	Sources by Source and Sink Ca	itegory	
Energy	Agriculture and LULUCF	IPPU	Waste
U.S. Energy Information	USDA U.S. Forest Service Forest	EPA Greenhouse Gas Reporting	
Administration	Inventory and Analysis Program (FIA)	Program (GHGRP)	Reporting Program (GHGRP)
U.S. Department of Commerce	USDA Natural Resource	U.S. Geological Survey (USGS)	EPA Office of Land and
– Bureau of the Census	Conservation Service (NRCS)	National Minerals Information Center	Emergency Management (OLEM)
U.S. Department of Defense –	USDA National Agricultural	American Chemistry Council	EPA Clean Watershed Needs
Defense Logistics Agency	Statistics Service (NASS) and Agricultural Research Service (ARS)	(ACC)	Survey (CWNS)
U.S. Department of Homeland Security	EPA Office of Research and Development (ORD)	American Iron and Steel Institute (AISI)	American Housing Survey
U.S. Department of	U.S. Fish and Wildlife Service	U.S. International Trade	Data from research studies,
Transportation - Federal		Commission (USITC)	trade publications, and
Highway Administration			industry associations
U.S. Department of	U.S. Department of Agriculture	Air-Conditioning, Heating, and	
Transportation - Federal Aviation Administration	(USDA) Animal and Plant Health	Refrigeration Institute	
U.S. Department of	Inspection Service (APHIS) Association of American Plant	Data from other U.S.	
Transportation & Bureau of	Food Control Officials (AAPFCO)	government agencies, research	
Transportation Statistics	rood control officials (700 Fee)	studies, trade publications, and	
		industry association	
U.S. Department of Labor –	National Oceanic and	UNEP Technology and	
Mine Safety and Health	Atmospheric Administration	Economic Assessment Panel	
Administration	(NOAA)	(TEAP)	
,	EPA Office of Land and Emergency	′	
its National Laboratories	Management (OLEM)		
EPA Acid Rain Program	USDA Farm Service Agency		
EPA MOVES Model	U.S. Geological Survey (USGS)		
	U.S. Department of the Interior		
Program (GHGRP)	(DOI), Bureau of Land		
	Management (BLM)		

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 109 of 1050 PageID 3557

U.S. Department of Labor -EPA Office of Land and Emergency Mine Safety and Health Management (OLEM) Administration American Association of Alaska Department of Natural Railroads Resources American Public Transportation U.S. Census Bureau Association Data from research studies, Data from research studies, trade trade publications, and industry publications, and industry associations associations

Note: This table is not an exhaustive list of all data sources.

1.3 Inventory Process

This section describes EPA's approach to preparing the annual U.S. Inventory, which consists of the National Inventory Report (NIR) and Common Reporting Format (CRF) tables. The inventory coordinator at EPA, with support from the cross-cutting compilation staff, is responsible for coordination of aggregation of all emission and removal estimates, conducting the overall uncertainty analysis of Inventory emissions and trends over time, and ensuring consistency and quality throughout the NIR and CRF tables. Emission and removal calculations, including associated uncertainty analysis for individual sources and/or sink categories are the responsibility of individual source and sink category leads, who are most familiar with each category, underlying data, and the unique national circumstances relevant to its emissions or removals profile. Using IPCC good practice guidance, the individual leads determine the most appropriate methodology and collect the relevant activity data to use in the emission and removal calculations, based upon their expertise in the source or sink category, as well as coordinating with researchers and expert consultants familiar with the sources and sinks. Each year, the coordinator oversees a multi-stage process for collecting information from each individual source and sink category lead to compile all information and data for the Inventory.

Methodology Development, Data Collection, and Emissions and Sink Estimation

Source and sink category leads at EPA collect input data and, as necessary, evaluate or develop the estimation methodology for the individual source and/or sink categories. Because EPA has been preparing the Inventory for many years, for most source and sink categories, the methodology for the previous year is applied to the new "current" year of the Inventory, and inventory analysts collect any new data or update data that have changed from the previous year. If estimates for a new source or sink category are being developed for the first time, or if the methodology is changing for an existing category (e.g., the United States is implementing improvement efforts to apply a higher tiered approach for that category), then the source and/or sink category lead will develop and implement the new or refined methodology, gather the most appropriate activity data and emission factors (or in some cases direct emission measurements) for the entire time series, and conduct any further category-specific review with involvement of relevant experts from industry, government, and universities (see Chapter 9 and Box ES-3 on EPA's approach to recalculations).

Once the methodology is in place and the data are collected, the individual source and sink category leads calculate emission and removal estimates. The individual leads then update or create the relevant report text and accompanying annexes for the Inventory. Source and sink category leads are also responsible for completing the relevant sectoral background tables of the CRF, conducting quality control (QC) checks, preparing relevant category materials for QA, or expert reviews, category-level uncertainty assessments, and reviewing data for publication in EPA's GHG Data Explorer.

The treatment of confidential business information (CBI) in the Inventory is based on EPA internal guidelines, as well as regulations ²⁹ applicable to the data used. EPA has specific procedures in place to safeguard CBI during the inventory compilation process. When information derived from CBI data is used for development of inventory calculations, EPA procedures ensure that these confidential data are sufficiently aggregated to protect confidentiality while still providing useful information for analysis. For example, within the Energy and Industrial Processes and Product Use (IPPU) sectors, EPA has used aggregated facility-level data from the Greenhouse Gas Reporting Program (GHGRP) to develop, inform, and/or quality-assure U.S. emission estimates. In 2014, EPA's GHGRP, with industry engagement, compiled criteria that would be used for aggregating its confidential data to shield the underlying CBI from public disclosure. ³⁰ In the Inventory, EPA is publishing only data values that meet the GHGRP aggregation criteria. ³¹ Specific uses of aggregated facility-level data are described in the respective methodological sections within those chapters. In addition, EPA uses historical data reported voluntarily to EPA via various voluntary initiatives with U.S. industry (e.g., EPA Voluntary Aluminum Industrial Partnership (VAIP)) and follows guidelines established under the voluntary programs for managing CBI.

Data Compilation and Archiving

The inventory coordinator at EPA with support from the data/document manager collects the source and sink categories' descriptive text and annexes, and also aggregates the emission and removal estimates into a summary data file that links the individual source and sink category data files together. This summary data file contains all of the essential data in one central location, in formats commonly used in the Inventory document. In addition to the data from each source and sink category, other national trend and related data are also gathered in the summary sheet for use in the Executive Summary, Introduction, and Trends sections of the Inventory report (e.g., GDP, population, energy use). Similarly, the recalculation analysis and key category analysis are completed in a separate data file based on output from the summary data file. The uncertainty estimates for each source and sink category are also aggregated into uncertainty summary data files that are used to conduct the overall Inventory uncertainty analysis (see Section 1.7). A Microsoft SharePoint work site, kept on a central server at EPA under the jurisdiction of the inventory coordinator, provides a platform for facilitating collaboration during each compilation phase, but also the efficient storage and archiving of electronic files each annual cycle. Previous final published inventories are also maintained on a report archive page on EPA's Greenhouse Gas Emissions website. 32

National Inventory Report (NIR) Preparation

The NIR is compiled from the sections developed by each individual source or sink category lead. In addition, the inventory coordinator prepares a brief overview of each chapter that summarizes the emissions and removals from all sources and sinks discussed in the chapters. Also at this time, the Executive Summary, Introduction, Trends in Greenhouse Gas Emissions and Removals, and Recalculations and Improvements chapters are drafted, to reflect the trends and impact from improvements for the time series of the current Inventory. The analysis of trends necessitates gathering supplemental data, including weather and temperature conditions, economic activity and gross domestic product, population, atmospheric conditions, and the annual consumption of electricity, energy, and fossil fuels. Changes in these data are used to explain the trends observed in greenhouse gas emissions in the United States. Furthermore, specific factors that affect individual sectors are researched and discussed. Many of

Introduction

²⁹ 40 CFR Part 2, Subpart B titled "Confidentiality of Business Information" which is the regulation establishing rules governing handling of data entitled to confidentiality treatment. See https://www.ecfr.gov/cgi-bin/text-idx?SID=a764235c9eadf9afe05fe04c07a28939&mc=true&node=sp40.1.2.b&rgn=div6.

³⁰ Federal Register Notice on "Greenhouse Gas Reporting Program: Publication of Aggregated Greenhouse Gas Data." See pp. 79 and 110 of notice at https://www.gpo.gov/fdsys/pkg/FR-2014-06-09/pdf/2014-13425.pdf.

³¹ U.S. EPA Greenhouse Gas Reporting Program. Developments on Publication of Aggregated Greenhouse Gas Data, November 25, 2014. See http://www.epa.gov/ghgreporting/confidential-business-information-ghg-reporting.

³² See https://www.epa.gov/ghgemissions/us-greenhouse-gas-inventory-report-archive.

the factors that affect emissions are included in the Inventory document as separate analyses or side discussions in boxes within the text. Finally, the uncertainty analysis and key category analysis are compiled and updated in the report as part of final analysis steps. Throughout the report text boxes are also created to provide additional documentation (e.g., definitions) and/or examine the data aggregated in different ways than in the remainder of the document, such as a focus on transportation activities or emissions from electricity generation. The document is prepared to align with the specification of the UNFCCC reporting guidelines for National Inventory Reports while also reflecting national circumstances.

Common Reporting Format Table (CRF) Compilation

The CRF tables are compiled from individual time series input data sheets completed by each individual source or sink category lead, which contain emissions and/or removals and activity data, estimates, methodological and completeness notations and associated explanations. The inventory coordinator and cross-cutting compilation staff import the category data into the UNFCCC's "CRF Reporter" for the United States, assuring consistency and completeness across all sectoral tables. The summary reports for emissions and removals, methods, and emission factors used, the summary tables indicating completeness of estimates (i.e., notation key NE/IE tables), the recalculation tables, and the emission and removal trends tables automatically compiled by the CRF Reporter and reviewed by the inventory coordinator with support from the cross-cutting compilation staff. Internal automated quality checks within the CRF Reporter, as well as reviews by the cross-cutting and category leads, are completed for the entire time series of CRF tables before submission.

QA/QC and Uncertainty

Quality assurance and quality control (QA/QC) and uncertainty analyses are guided by the QA/QC and Inventory coordinators, who help maintain the QA/QC plan and the overall uncertainty analysis procedures (see sections on QA/QC and Uncertainty, below) in collaboration with the broader inventory compilation team. The QA/QC coordinator works closely with the Inventory coordinator and source and sink category leads to ensure that a consistent QA/QC plan is implemented across all inventory categories. Similarly, the Inventory coordinator ensures the uncertainty analysis is implemented consistently across all categories. The inventory QA/QC plan, outlined in Section 1.7 and Annex 8, is consistent with the quality assurance procedures outlined by EPA and IPCC good practices. The QA/QC and uncertainty findings also inform overall improvement planning, and specific improvements are noted in the Planned Improvements sections of respective categories. QA processes are outlined below.

Expert, Public, and UNFCCC Reviews

The compilation of the inventory includes a two-stage review or QA process, in addition to international technical expert review following submission of the report to the UNFCCC. During the first stage (the 30-day Expert Review period), a first draft of sectoral chapters of the document are sent to a select list of technical experts outside of EPA who are not directly involved in preparing estimates. The purpose of the Expert Review is to provide an objective review, encourage feedback on the methodological and data sources used in the current Inventory, especially for sources and sinks which have experienced any changes since the previous Inventory.

Once comments are received and addressed, the second stage, or second draft of the document is released for public review by publishing a notice in the U.S. Federal Register and posting the entire draft Inventory document on the EPA website. The Public Review period allows for a 30-day comment period and is open to the entire U.S. public. Comments received may require further discussion with experts and/or additional research, and specific Inventory improvements requiring further analysis as a result of comments are noted in the relevant category's Planned Improvement section. EPA publishes responses to comments received during both reviews with the publication of the final report on its report website.

Following completion and submission of the report to the UNFCCC, the report also undergoes review by an international team of independent experts for adherence to UNFCCC reporting guidelines and IPCC methodological

guidance.³³ Feedback from all review processes that contribute to improving inventory quality over time are described within each planned improvement section and further in Annex 8. See also the Improvement Planning process discussed below.

Final Submittal to UNFCCC, Document and Data Publication

After the final revisions to incorporate any comments from the Expert Review and Public Review periods, EPA prepares the final NIR and the accompanying CRF tables for electronic reporting. EPA, as the National Inventory focal point, sends the official submission of the U.S. Inventory to the UNFCCC using the CRF Reporter software, coordinating with the U.S. Department of State, the overall UNFCCC focal point. Concurrently, for timely public access, the report is also published on EPA's website. ³⁴ On EPA's website, users can also visualize and download the current time-series estimates from the GHG Inventory Data Explorer Tool, ³⁵ and also download more detailed data presented in tables within the report and report annex in CSV format.

Improvement Planning

Each year, many emission and sink estimates in the Inventory of U.S. Greenhouse Gas Emissions and Sinks are recalculated and revised, through the use of better methods and/or data with the goal of improving inventory quality and reducing uncertainties, including the transparency, completeness, consistency, and overall usefulness of the report. In this effort, the United States follows the 2006 IPCC Guidelines (IPCC 2006), which state, "Both methodological changes and refinements over time are an essential part of improving inventory quality. It is good practice to change or refine methods when available data have changed; the previously used method is not consistent with the IPCC guidelines for that category; a category has become key; the previously used method is insufficient to reflect mitigation activities in a transparent manner; the capacity for inventory preparation has increased; improved inventory methods become available; and/or for correction of errors." The EPA's OAP coordinates improvement planning across all sectors and also cross-cutting analyses based on annual review and input from the technical teams leading compilation of each sector's estimates, including continuous improvements to the overall data and document compilation processes. Planned improvements are identified through QA/QC processes (including completeness checks), the key category analysis, and the uncertainty analysis. The inventory coordinator, with input from EPA source and sink category leads, maintains a log of all planned improvements, by sector and cross-cutting, tracking the category significance, specific category improvement, prioritization, anticipated time frame for implementation of each proposed improvement, and status of progress in implementing improvement. Improvements for significant or key categories are usually prioritized across all improvements unless effort would require disproportionate levels of effort and resources relative to improvements for other key categories to address.

1.4 Methodology and Data Sources

Emissions and removals of greenhouse gases from various source and sink categories have been estimated using methodologies that are consistent with the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2006) and its supplements and refinements. To a great extent, this report makes use of published official economic and physical statistics for activity data, emission factors and other key parameters. Depending on the category, activity data can include fuel consumption or deliveries, vehicle-miles traveled, raw material processed, etc.

Introduction

³³ See https://unfccc.int/process-and-meetings/transparency-and-reporting/reporting-and-review-under-the-convention/greenhouse-gas-inventories-annex-i-parties/review-process.

³⁴ See https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

³⁵ See https://cfpub.epa.gov/ghgdata/inventoryexplorer/.

Emission factors are factors that relate quantities of emissions to an activity. For more information on data sources see Section 1.2 above, Box 1-1 on use of GHGRP data, and categories' methodology sections for more information on other data sources. In addition to official statistics, the report utilizes findings from academic studies, trade association surveys and statistical reports, along with expert judgment, consistent with the 2006 IPCC Guidelines.

The methodologies provided in the 2006 IPCC Guidelines represent foundational methodologies for a variety of source and sink categories, and many of these methodologies continue to be improved and refined as new research and data become available. This report uses those IPCC methodologies when applicable, and supplements them with refined guidance, other available country-specific methodologies and data where possible (e.g., EPA's GHGRP). For example, as noted earlier in this chapter, this report does apply recent supplements and refinements to 2006 IPCC Guidelines in estimating emissions and removals from coal mining, wastewater treatment and discharge, low voltage anode effects (LVAE) during aluminum production, drained organic soils, and management of wetlands, including flooded lands. Choices made regarding the methodologies and data sources used are provided in the Methodology and Time Series Consistency discussion of each category within each sectoral chapter of the report. Where additional detail is helpful and necessary to explain methodologies and data sources used to estimate emissions, complete documentation is provided in the annexes as indicated in the methodology sections of those respective source categories (e.g., Annex 3.13 for Forest Land Remaining Forest Land and Land Converted to Forest Land).

1.5 Key Categories

The 2006 IPCC Guidelines (IPCC 2006) and 2019 Refinement to the 2006 IPCC Guidelines (IPCC 2019) define key categories as "inventory categories which individually, or as a group of categories (for which a common method, emission factor and activity data are applied) are prioritized within the national inventory system because their estimates have a significant influence on a country's total inventory of greenhouse gases in terms of the absolute level, the trend, or the level of uncertainty in emissions or removals. Whenever the term *key category* is used, it includes both source and sink categories." ³⁶ A key category analysis identifies source or sink categories for focusing efforts to improve overall Inventory quality, including additional review when feasible.

The 2006 IPCC Guidelines (IPCC 2006) and its 2019 Refinement (2019) define several approaches, both quantitative and qualitative, to conduct a key category analysis and identify key categories both in terms of absolute level and trend, along with consideration of uncertainty. This report employs all approaches to identify key categories for the United States. The first approach, Approach 1, identifies significant or key categories without considering uncertainty in its calculations. An Approach 1 level assessment identifies all source and sink categories that cumulatively account for 95 percent of total level, i.e., total emissions (gross) in a given year when assessed in descending order of absolute magnitude. The level analysis was performed twice, including and excluding sources and sinks from the Land Use, Land-Use Change, and Forestry (LULUCF) sector categories. Similarly, an Approach 1 trend analysis can identify categories with trends that significantly influence overall trends by identifying all source and sink categories that cumulatively account for 95 percent of the sum all the trend assessments (e.g., percent change relative to national trend) when sorted in descending order of absolute magnitude.

The next method, Approach 2, was then implemented to identify any additional key categories not already identified from the Approach 1 level and trend assessments by considering uncertainty. The Approach 2 analysis differs from Approach 1 by incorporating each category's uncertainty assessments in its calculations and was also performed twice, including and excluding LULUCF categories. An Approach 2 level assessment identifies all sources and sink categories that cumulatively account for 90 percent of the sum of all level assessments when sorted in descending order of magnitude. Similarly, an Approach 2 trend analysis can identify categories whose trends

³⁶ See Chapter 4 Volume 1, "Methodological Choice and Identification of Key Categories" in IPCC (2006) and IPCC (2019). See http://www.ipcc-nggip.iges.or.ip/public/2006gl/index.html.

contribute significantly to overall trends weighting the relative trend difference with the category's relative uncertainty assessment for 2021.

For 2021, based on the key category analysis, excluding the LULUCF sector and uncertainty, 32 categories accounted for 95 percent of emissions. Four categories account for 57 percent of emissions: CO_2 from coal-fired electricity generation, CO_2 from gas fired electricity generation, CO_2 from road transport-related fuel combustion, and CO_2 from substitutes for ozone depleting substances. When considering uncertainties, additional categories such as CH_4 emissions from industrial landfills were also identified as a key category. In the trend analysis, 33 categories were identified as key categories, and when considering uncertainties, 6 additional categories were identified as key. The trend analysis shows that HFC and PFC emissions from substitutes of ozone depleting substances, in addition to CO_2 from coal-fired electricity generation and CO_2 from gas fired electricity generation, and CO_2 from road transport related combustion are also significant with respect to trends over the time series.

When considering the contribution of the LULUCF sector to 2021 emissions and sinks, 43 categories accounted for 95 percent of emissions and sinks, with the most significant category from LULUCF being net CO_2 emission from Forest Land Remaining Forest Land. When considering uncertainties and the contribution of the LULUCF sector, additional categories such as N_2O emissions from forest fires were also identified as a key category. In the trend analysis, 39 categories were identified as key, and when considering uncertainties, 8 additional categories were identified as key. The trend analysis includes additional categories such as non- CO_2 emissions from forest fires as key categories in the LULUCF sector.

Finally, in addition to conducting Approach 1 and 2 level and trend assessments as described above, a qualitative assessment of the source and sinks categories was conducted to capture any additional key categories that were not identified using the previously described quantitative approaches. For this Inventory, no additional categories were identified using qualitative criteria recommend by IPCC, but EPA continues to review its qualitative assessment on an annual basis. Find more information on the key category analysis, including the approach to disaggregation of inventory estimates, see Annex 1 to this report.

Table 1-4: Summary of Key Categories for the United States (1990 and 2021) by Sector

			Appro	ach 1		Approa	ich 2 (inclu	des uncert	ainty)	2021
CRF Code and		Level	Trend	Level	Trend	Level	Trend	Level	Trend	Emissions
Source/Sink		Without	Without	With	With	Without	Without	With	With	(MMT
Categories	Gas	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	CO ₂ Eq.)
Energy										
1.A.3.b CO ₂										
Emissions from	CO ₂	•	•	•	•	•	•	•	•	1,456.3
Transportation: Road										
1.A.1 CO ₂ Emissions										
from Stationary										
Combustion - Coal -	CO ₂	•	•	•	•	•	•	•	•	909.9
Electricity										
Generation										
1.A.1 CO ₂ Emissions										
from Stationary										
Combustion - Gas -	CO ₂	•	•	•	•	•	•	•	•	612.9
Electricity										
Generation										
1.A.2 CO ₂ Emissions										
from Stationary	CO ₂								•	499.6
Combustion - Gas -	CO ₂		•	•	•		•	•	•	455.0
Industrial										

		I	Appro	ach 1		A 2222	ach 2 (includ		ابيغين	2021
CRF Code and Source/Sink Categories	Gas	Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	Level Without LULUCF	Trend Without LULUCF	Level With	Trend With LULUCF	Emissions (MMT CO ₂ Eq.)
1.A.4.b CO ₂ Emissions from Stationary Combustion - Gas - Residential	CO ₂	•	•	•	•	•		•		258.6
1.A.2 CO ₂ Emissions from Stationary Combustion - Oil - Industrial	CO ₂	•	•	•	•	•	•	•	•	232.9
1.A.4.a CO ₂ Emissions from Stationary Combustion - Gas - Commercial	CO ₂	•	•	•	•	•	•	•	•	180.9
1.A.3.a CO ₂ Emissions from Transportation: Aviation	CO ₂	•	•	•	•	•	•	•		153.3
1.A.5 CO ₂ Emissions from Non-Energy Use of Fuels	CO ₂	•	•	•	•	•	•	•	•	140.2
1.A.3.e CO ₂ Emissions from Transportation: Other	CO ₂	•	•	•	•		•			64.2
1.A.4.b CO ₂ Emissions from Stationary Combustion - Oil - Residential	CO ₂	•	•	•	•		•		•	54.7
1.A.4.a CO ₂ Emissions from Stationary Combustion - Oil - Commercial	CO ₂	•	•	•	•					50.7
1.A.2 CO ₂ Emissions from Stationary Combustion - Coal - Industrial	CO ₂	•	•	•	•	•	•	•	•	43.0
1.A.3.d CO ₂ Emissions from Transportation: Domestic Navigation	CO ₂	•		•						41.2
1.B.2 CO ₂ Emissions from Natural Gas Systems	CO ₂	•		•						36.2
1.A.3.c CO ₂ Emissions from Transportation: Railways	CO ₂	•		•						32.2

			Appro	ach 1		Approa	ach 2 (includ	les uncert	aintv)	2021
CRF Code and Source/Sink	Coo	Level Without	Trend Without	Level With	Trend With	Level Without	Trend Without	Level With	Trend With	Emissions (MMT
Categories 1.B.2 CO ₂ Emissions	Gas	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	CO₂ Eq.)
from Petroleum Systems	CO ₂	•	•	•	•		•		•	24.7
1.A.1 CO ₂ Emissions from Stationary Combustion - Oil - Electricity Generation	CO ₂	•	•	•	•	•	•		•	17.7
1.A.5 CO ₂ Emissions from Stationary Combustion - Oil - U.S. Territories	CO ₂	•		•						17.0
1.A.5.b CO ₂ Emissions from Transportation: Military	CO ₂		•		•					5.2
1.A.4.a CO ₂ Emissions from Stationary Combustion - Coal - Commercial	CO ₂				•					1.4
1.A.4.b CO ₂ Emissions from Stationary Combustion - Coal - Residential	CO ₂						•		•	0.0
1.B.2 CH₄ Fugitive Emissions from Natural Gas Systems	CH ₄	•	•	•	•	•	•	•	•	181.4
1.B.2 CH₄ Fugitive Emissions from Petroleum Systems	CH ₄	•		•		•				50.2
1.B.1 Fugitive CH ₄ Emissions from Coal Mining	CH₄	•	•	•	•	•	•	•	•	44.7
1.B.2 CH ₄ Fugitive Emissions from Abandoned Oil and Gas Wells	CH₄					•		•		8.2
1.A.4.b CH ₄ Emissions from Stationary Combustion - Residential	CH₄					•	•	•	•	4.6
1.A.1 N ₂ O Emissions from Stationary Combustion - Coal - Electricity Generation	N₂O					•				15.1

	ı	Г				ı				T
			Appro				ach 2 (includ			2021
CRF Code and		Level	Trend	Level	Trend	Level	Trend	Level	Trend	Emissions
Source/Sink		Without	Without	With	With	Without	Without	With	With	(MMT
Categories	Gas	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	CO ₂ Eq.)
1.A.3.b N ₂ O										0.4
Emissions from	N ₂ O	•	•	•	•	•	•		•	9.4
Transportation: Road										
1.A.1 N ₂ O Emissions										
from Stationary										2.0
Combustion - Gas -	N ₂ O						•			3.9
Electricity										
Generation										
Industrial Processes ar	nd Produc	t Use								
2.C.1 CO ₂ Emissions										
from Iron and Steel										
Production &	CO ₂	•	•	•	•	•	•	•	•	41.7
Metallurgical Coke										
Production										
2.A.1 CO ₂ Emissions										
from Cement	CO ₂	•	•	•	•					41.3
Production										
2.B.8 CO ₂ Emissions										
from Petrochemical	CO ₂	•	•	•	•					33.2
Production										
2.B.3 N ₂ O Emissions										
from Adipic Acid	N ₂ O		•		•					6.6
Production										
2.F.1 Emissions from										
Substitutes for										
Ozone Depleting	HFCs,	•	•	•	•	•	•	•	•	139.1
Substances:	PFCs									
Refrigeration and Air										
conditioning										
2.F.4 Emissions from										
Substitutes for	HFCs,	•	•	•	•	•	•	•	•	17.7
Ozone Depleting	PFCs									
Substances: Aerosols										
2.F.2 Emissions from										
Substitutes for	HFCs,									10.0
Ozone Depleting	PFCs		•		•					10.8
Substances: Foam Blowing Agents	1103									
2.G SF ₆ and CF ₄ Emissions from										
Electrical	SF ₆ ,		_	_	_		_		_	6.0
Transmission and	CF ₄	•	•	•	•		•		•	6.0
Distribution										
2.B.9 HFC-23										
Emissions from	HFCs						•			2.2
HCFC-22 Production	HPCS									2.2
2.C.3 PFC Emissions										
from Aluminum	PFCs		•							0.9
Production	Pres	•	•	•	•					0.9
Agriculture										

			Appro	ach 1		Annros	ach 2 (includ	les uncert	aintv\	2021
CRF Code and		Level	Trend	Level	Trend	Level	Trend	Level	Trend	Emissions
Source/Sink		Without	Without	With	With	Without	Without	With	With	(MMT
Categories	Gas	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	CO ₂ Eq.)
3.A.1 CH ₄ Emissions										
from Enteric	CH ₄	•	•	•	•	•	•	•		188.2
Fermentation: Cattle										
3.B.1 CH ₄ Emissions										
from Manure	CH₄	•	•	•	•	•	•		•	37.9
Management: Cattle										
3.B.4 CH ₄ Emissions										
from Manure	CH₄									28.1
Management: Other	C114			·	·					20.1
Livestock										
3.C CH ₄ Emissions	CH₄					•		•		16.8
from Rice Cultivation	СП4	•						•		10.0
3.D.1 Direct N ₂ O										
Emissions from	N ₂ O						•		•	264.7
Agricultural Soil	IN ₂ O			•		·	•	•	•	204.7
Management										
3.D.2 Indirect N ₂ O										
Emissions from	N ₂ O	•		•		•		•		29.3
Applied Nitrogen										
Waste	•					•				•
5.A CH ₄ Emissions										400 =
from MSW Landfills	CH₄	•	•	•	•	•	•	•	•	103.7
5.A CH ₄ Emissions										
from Industrial	CH ₄	•		•		•	•		•	18.9
Landfills										
5.D CH ₄ Emissions										
from Domestic	CLI									42.0
Wastewater	CH₄					•				13.9
Treatment										
5.D N ₂ O Emissions										
from Domestic										
Wastewater	N ₂ O	•		•		•	•	•	•	20.4
Treatment										
Land Use, Land-Use Ch	ange, and	Forestry				I.				I.
4.E.2 Net CO ₂										
Emissions from Land										
Converted to	CO ₂			•	•			•	•	81.0
Settlements										
4.B.2 Net CO ₂										
Emissions from Land										
Converted to	CO ₂			•				•		56.5
Cropland										
4.C.1 Net CO ₂										
Emissions from										
Grassland Remaining	CO ₂							•	•	10.0
Grassland										
4.B.1 Net CO ₂										
Emissions from										l .
Cropland Remaining	CO ₂			•				•	•	(18.9)
Cropland	1	1								

-			Appro	ach 1		Approa	ach 2 (includ	des uncert	ainty)	2021
CRF Code and		Level	Trend	Level	Trend	Level	Trend	Level	Trend	Emissions
Source/Sink		Without	Without	With	With	Without	Without	With	With	(MMT
Categories	Gas	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	LULUCF	CO ₂ Eq.)
4.C.2 Net CO ₂ Emissions from Land Converted to Grassland	CO ₂			•	•			•	•	(24.7)
4.A.2 Net CO ₂ Emissions from Land Converted to Forest Land	CO ₂			•				•		(98.3)
4.E.1 Net CO ₂ Emissions from Settlements Remaining Settlements	CO ₂			•	•			•	•	(134.5)
4.A.1 Net CO ₂ Emissions from Forest Land Remaining Forest Land	CO ₂			•	•			•	•	(695.4)
4.D.1 CH ₄ Emissions from Flooded Lands Remaining Flooded Lands	CH₄			•						45.4
4.A.1 CH ₄ Emissions from Forest Fires	CH₄				•				•	15.5
4.A.1 N ₂ O Emissions from Forest Fires	N ₂ O								•	8.9
Subtotal of Key Catego	ries With	out LULUCI	b							6,171.7
Total Gross Emissions	Without L	ULUCF								6,340.2
Percent of Total Witho	ut LULUC	F								97%
Subtotal of Key Catego	ries With	LULUCFc								5,384.5
Total Net Emissions W	ith LULUC	:F								5,586.0
Percent of Total With LULUCF						96%				
NO (Not Occurring)										

NO (Not Occurring)

Note: Parentheses indicate negative values (or sequestration).

1.6 Quality Assurance and Quality Control (QA/QC)

As part of efforts to achieve its stated goals for inventory quality, transparency, and credibility, the United States has developed a quality assurance and quality control plan designed to check, document, and improve the quality of its inventory over time. QA/QC activities on the Inventory are undertaken within the framework of the U.S.

^a Other includes emissions from pipelines.

^b Subtotal includes key categories from Level Approach 1 Without LULUCF, Level Approach 2 Without LULUCF, Trend Approach 1 Without LULUCF, and Trend Approach 2 Without LULUCF.

^c Subtotal includes key categories from Level Approach 1 With LULUCF, Level Approach 2 With LULUCF, Trend Approach 1 With LULUCF, and Trend Approach 2 With LULUCF.

Quality Assurance/Quality Control and Uncertainty Management Plan (QA/QC plan) for the U.S. Greenhouse Gas Inventory: Procedures Manual for QA/QC and Uncertainty Analysis.

Key attributes of the QA/QC plan are summarized in Figure 1-2. These attributes include:

- Procedures and Forms: detailed and specific systems that serve to standardize the process of documenting and archiving information, as well as to guide the implementation of QA/QC and the analysis of uncertainty
- Implementation of Procedures: application of QA/QC procedures throughout the whole Inventory development process from initial data collection, through preparation of the emission and removal estimates, to publication of the Inventory
- Quality Assurance (QA): expert and public reviews for both the inventory estimates and the Inventory report (which is the primary vehicle for disseminating the results of the inventory development process). The expert technical review conducted by the UNFCCC supplements these QA processes, consistent with the QA good practice and the 2006 IPCC Guidelines (IPCC 2006)
- Quality Control (QC): application of General (Tier 1) and Category-specific (Tier 2) quality controls and checks, as recommended by 2006 IPCC Guidelines (IPCC 2006), along with consideration of secondary data and category-specific checks (additional Tier 2 QC) in parallel and coordination with the uncertainty assessment; the development of protocols and templates, which provides for more structured communication and integration with the suppliers of secondary information
- General (Tier 1) and Category-specific (Tier 2) Checks: quality controls and checks, as recommended by IPCC Good Practice Guidance and 2006 IPCC Guidelines (IPCC 2006)
- Record Keeping: provisions to track which procedures have been followed, the results of the QA/QC, uncertainty analysis, and feedback mechanisms for corrective action based on the results of the investigations which provide for continual data quality improvement and guided research efforts.
- Multi-Year Implementation: a schedule for coordinating the application of QA/QC procedures across multiple years, especially for category-specific QC, prioritizing key categories
- Interaction and Coordination: promoting communication within the EPA, across Federal agencies and departments, state government programs, and research institutions and consulting firms involved in supplying data or preparing estimates for the Inventory. The QA/QC Management Plan itself is intended to be revised and reflect new information that becomes available as the program develops, methods are improved, or additional supporting documents become necessary.

Figure 1-2: U.S. QA/QC Plan Summary

	Data	Data	Calculating	Cross-Cutting
	Gathering 🔔	Documentation	Emissions	Coordination
Inventory Analyst	Obtain data in electronic format (if possible) Review data input/calculation workbooks Avoid hardwiring Use data validation Protect cells Develop automatic checkers for: Outliers, negative values, or missing data Variable types match values Time series consistency Maintain tracking tab for status of gathering efforts	Contact reports for non-electronic communications Provide cell references for primary data elements Obtain copies of all data sources List and location of any working/external data or input/calculation workbooks Document assumptions Complete QA/QC checklists CRF and summary tab links	Clearly label parameters, units, and conversion factors Review data input/calculation workbooks integrity Equations Units Inputs and outputs Develop automated checkers for: Input ranges Calculations Emission aggregation Trend and IEF checks	 Common starting versions for each inventory year Utilize unalterable summary and CRF tab for each source data input/calculation workbook for linking to a master summary workbook Follow strict
QA/QC Analyst	Check input data for transcription errors Inspect automatic checkers Identify data input/calculation workbooks modifications that could provide additional QA/QC checks	Check citations in data input/calculation workbooks and text for accuracy and style Check reference docket for new citations Review documentation for any data / methodology changes Complete QA/QC checklists CRF and summary tab links	Reproduce calculations Review time series consistency Review changes in data/consistency with IPCC methodology	version control procedures • Document QA/QC procedures

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 122 of 1050 PageID 3570

Box 1-3: Examples of Verification Activities

Consistent with IPCC guidance for national greenhouse gas inventories, verification activities include comparisons with emission or removal estimates prepared by other bodies and comparisons with estimates derived from fully independent assessments, e.g., atmospheric concentration measurements. Verification activities provide information to improve inventories and are part of the overall QA/QC system.

Use of lower tier methods. The UNFCCC reporting guidelines require countries to complete a "top-down" reference approach for estimating CO₂ emissions from fossil fuel combustion in addition to their "bottom-up" sectoral methodology for purposes of verification. This estimation method uses alternative methodologies and different data sources than those contained in that section of the Energy chapter. The reference approach estimates fossil fuel consumption by adjusting national aggregate fuel production data for imports, exports, and stock changes rather than relying on end-user consumption surveys (see Annex 4 of this report). The reference approach assumes that once carbon-based fuels are brought into a national economy, they are either saved in some way (e.g., stored in products, kept in fuel stocks, or left unoxidized in ash) or combusted, and therefore the carbon in them is oxidized and released into the atmosphere. Accounting for actual consumption of fuels at the sectoral or sub-national level is not required.

Use of Ambient Measurements Systems for Validation of Emission Inventories. In following the UNFCCC requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and sinks presented in this report are organized by source and sink categories and calculated using internationally accepted methods provided by the IPCC. ³⁷ Several recent studies have estimated emissions at the national or regional level with estimated results that sometimes differ from EPA's estimate of emissions. EPA has engaged with researchers on how remote sensing, ambient measurement, and inverse modeling techniques for estimating greenhouse gas emissions could assist in improving the understanding of inventory estimates. In working with the research community to improve national greenhouse gas inventories, EPA follows guidance from the IPCC on the use of measurements and modeling to validate emission inventories. ³⁸ An area of particular interest in EPA's outreach efforts is how ambient measurement data can be used to assess estimates or potentially be incorporated into the Inventory in a manner consistent with this Inventory report's transparency of its calculation methodologies, and the ability of inverse modeling to attribute emissions and removals from remote sensing to anthropogenic sources, as defined by the IPCC for this report, versus natural sources and sinks.

The 2019 Refinement to the IPCC 2006 Guidelines for National Greenhouse Gas Inventories (IPCC 2019) Volume 1 General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. The 2019 Refinement provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC [2019] Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC [2019] Volume 1, Chapter 6) given the technical complexity of such comparisons. Further, it identified fluorinated gases as particularly suitable for such comparisons. The 2019 Refinement makes this conclusion for fluorinated gases based on their lack of significant natural sources, their generally long atmospheric lifetimes, their well-known loss mechanisms, and the potential uncertainties in bottom-up inventory methods for some of their sources. Unlike emissions of CO₂, CH₄, and N₂O, emissions of fluorinated greenhouse gases are almost exclusively anthropogenic, meaning that the fluorinated greenhouse gas emission sources included in this Inventory account for the majority of the total U.S. emissions of these gases detectable in the atmosphere.

In this Inventory, EPA presents the results of two comparisons between fluorinated gas emissions inferred from atmospheric measurements and fluorinated gas emissions estimated based on bottom-up measurements and modeling consistent with guidance from the 2019 Refinement. These comparisons, performed for HFCs and SF₆

Introduction

³⁷ See http://www.ipcc-nggip.iges.or.jp/public/index.html.

³⁸ See http://www.ipcc-nggip.iges.or.jp/meeting/pdfiles/1003 Uncertainty%20meeting report.pdf.

respectively, are described under the QA/QC and Verification discussions in Chapter 4, Sections 4.24 Substitution of Ozone Depleting Substances and 4.25 Electrical Transmission and Distribution in the IPPU chapter of this report.

Consistent with the *2019 Refinement*, a key element to facilitate such comparisons is a gridded prior inventory as an input to inverse modeling. To improve the ability to compare the national-level greenhouse gas inventory with measurement results that may be at other scales, a team at Harvard University along with EPA and other coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1° x 0.1° spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization. The gridded inventory is designed to be consistent with the 1990 to 2014 U.S. EPA *Inventory of U.S. Greenhouse Gas Emissions and Sinks* estimates for the year 2012, which presents national totals for different source types. ³⁹ This gridded inventory is consistent with the recommendations contained in two National Academies of Science reports examining greenhouse gas emissions data (National Research Council 2010; National Academies of Sciences, Engineering, and Medicine 2018).

Finally, in addition to use of atmospheric concentration measurement data for comparison with Inventory data, information from top-down studies is directly incorporated in the Natural Gas Systems calculations to quantify emissions from certain well blowout events.

In addition, based on the national QA/QC plan for the Inventory, some sector, subsector and category-specific QA/QC and verification checks have been developed. These checks follow the procedures outlined in the national QA/QC plan, tailoring the procedures to the specific documentation and data files associated with individual sources. For each greenhouse gas emissions source or sink category included in this Inventory, a minimum of general or Tier 1 QC analysis has been undertaken. Where QC activities for a particular category go beyond the minimum Tier 1 level, and include category-specific checks (Tier 2) or include verification, further explanation is provided within the respective source or sink category text. Similarly, responses or updates based on comments from the expert, public and the international technical expert reviews (e.g., UNFCCC) are also addressed within the respective source or sink category sections in each sectoral chapter and Annex 8.

The quality control activities described in the U.S. QA/QC plan occur throughout the inventory process; QA/QC is not separate from, but is an integral part of, preparing the Inventory. Quality control—in the form of both good practices (such as documentation procedures) and checks on whether good practices and procedures are being followed—is applied at every stage of inventory development and document preparation. In addition, quality assurance occurs during the Expert Review and the Public Review, in addition to the UNFCCC expert technical review. While all phases significantly contribute to improving inventory quality, the public review phase is also essential for promoting the openness of the inventory development process and the transparency of the inventory data and methods.

The QA/QC plan guides the process of ensuring inventory quality by describing data and methodology checks, developing processes governing peer review and public comments, and developing guidance on conducting an analysis of the uncertainty surrounding the emission and removal estimates. The QA/QC procedures also include feedback loops and provide for corrective actions that are designed to improve the inventory estimates over time.

³⁹ See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 124 of 1050 PageID 3572

1.7 Uncertainty Analysis of Emission Estimates

Emissions and removals calculated for the U.S. Inventory reflect best estimates for greenhouse gas source and sink categories in the United States and are continuously revised and improved as new information becomes available. Uncertainty assessment is an essential element of a complete and transparent emissions inventory because it helps inform and prioritize Inventory improvements. For the U.S. Inventory, uncertainty analyses are conducted for each source and sink category as well as for the uncertainties associated with the overall emission (current and base year) and trends estimates. These analyses reflect the quantitative uncertainty in the emission (and removal) estimates associated with uncertainties in their input parameters (e.g., activity data and EFs) and serve to evaluate the relative contribution of individual input parameter uncertainties to the overall Inventory, its trends, and each source and sink category.

The overall level and trend uncertainty estimates for total U.S. greenhouse gas emissions was developed using the IPCC Approach 2 uncertainty estimation methodology (assuming a Normal distribution for Approach 1 estimates), which employs a Monte Carlo Stochastic Simulation technique. The IPCC provides good practice guidance on two approaches—Approach 1 and Approach 2—to estimating uncertainty for both individual and combined source categories. Approach 2 quantifies uncertainties based on a distribution of emissions (or removals), built-up from repeated calculations of emission estimation models and the underlying input parameters, randomly selected according to their known distributions. Approach 2 methodology is applied to each individual source and sink category wherever data and resources are permitted and is also used to quantify the uncertainty in the overall Inventory and its Trends. Source and sink chapters in this report provide additional details on the uncertainty analysis conducted for each source and sink category. See Annex 7 of this report for further details on the U.S. process for estimating uncertainty associated with the overall emission (base and current year) and trends estimates. Consistent with IPCC (IPCC 2006), the United States has ongoing efforts to continue to improve the overall Inventory uncertainty estimates presented in this report.

The United States has also implemented many improvements over the last several years to reduce uncertainties across the source and sink categories and improve Inventory estimates. These improvements largely result from new data sources that provide more accurate data and/or increased data coverage, as well as methodological improvements. Following IPCC good practice, additional efforts to reduce Inventory uncertainties can occur through efforts to incorporate excluded emission and sink categories (see Annex 5), improve estimation methods, and collect more detailed, measured, and representative data. Individual category chapters and Annex 7 both describe current ongoing and planned Inventory and uncertainty analysis improvements. Consistent with IPCC (2006), the United States has ongoing efforts to continue to improve the category-specific uncertainty estimates presented in this report, largely prioritized by considering improvements categories identified as significant by the Key Category Analysis.

Estimates of quantitative uncertainty for the total U.S. greenhouse gas emissions in 1990 (base year) and 2021 are shown below in Table 1-5 and Table 1-6, respectively. The overall uncertainty surrounding the Total Net Emissions is estimated to be -5 to +6 percent in 1990 and -4 to +6 percent in 2021. When the LULUCF sector is excluded from the analysis the uncertainty is estimated to be -2 to +5 percent in 1990 and -2 to +6 percent in 2021.

Table 1-5: Estimated Overall Inventory Quantitative Uncertainty for 1990 (MMT CO₂ Eq. and Percent)

	1990 Emission	Uncertainty	Range Relati	ve to Greenl	nouse Gas		Standard
Gas	Estimate (MMT CO ₂		Estima	te ^a		Mean ^b	Deviation ^b
	Eq.)	(MMT CO ₂ Eq.)		(%)	(MMT C	O ₂ Eq.)
		Lower	Upper	Lower	Upper		
		Bound ^c	Bound ^c	Bound	Bound		
CO ₂	5,121.0	5,008.4	5,356.5	-2%	5%	5,084.8	89.7
CH_4^d	868.7	784.7	941.9	-10%	8%	742.3	40.2
N_2O^d	406.3	333.2	616.3	-18%	52%	437.4	72.9
PFC, HFC, SF ₆ , and NF ₃ ^d	91.4	81.3	101.7	-11%	11%	195.6	5.5
Total Gross Emissions	6,487.3	6,352.9	6,833.1	-2%	5%	6,460.2	122.8
LULUCF Emissions ^e	57.9	54.9	61.5	-5%	6%	78.2	1.7
LULUCF Carbon Stock Change Flux	(938.9)	(1,179.6)	(856.4)	26%	-9%	(901.2)	83.0
LULUCF Sector Net Total ^g	(881.0)	(1,122.0)	(798.7)	27%	-9%	(823.1)	83.0
Net Emissions (Sources and Sinks)	5606.4	5,338.3	5,920.4	-5%	6%	5,637.1	148.2

^a The lower and upper bounds for emission estimates correspond to a 95 percent confidence interval, with the lower bound corresponding to 2.5th percentile and the upper bound corresponding to 97.5th percentile.

Table 1-6: Estimated Overall Inventory Quantitative Uncertainty for 2021 (MMT CO₂ Eq. and Percent)

	2021 Emission U	Incertainty	Range Relat	ive to Gree	enhouse		Standard
	Estimate		Gas Estim	atea		Meanb	Deviationb
Gas	(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.) (MMT CO ₂ E		₂ Eq.) (%)		(MMT	CO₂ Eq.)
		Lower	Upper	Lower	Upper		
		Bound ^c	Bound ^c	Bound	Bound		
CO ₂	5,032.2	4,916.2	5,241.7	-2%	4%	5,080) 84
CH_4^d	727.4	678.2	810.4	-7%	11%	743	3 34
N_2O^d	393.3	312.7	604.9	-20%	54%	436	5 76
PFC, HFC, SF ₆ , and NF ₃ ^d	187.3	178.7	212.0	-5%	13%	196	5 8
Total Gross Emissions	6,340.2	6,236.1	6,695.2	-2%	6%	6,454	118
LULUCF Emissions ^e	77.8	73.5	83.6	-6%	7%	78	3

^b Mean value indicates the arithmetic average of the simulated emission estimates; standard deviation indicates the extent of deviation of the simulated values from the mean.

^c The lower and upper bound emission estimates for the sub-source categories do not sum to total emissions because the low and high estimates for total emissions were calculated separately through simulations.

^d The overall uncertainty estimates did not take into account the uncertainty in the GWP values for CH₄, N₂O and high GWP gases used in the Inventory emission calculations for 1990.

^e LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands, Land Converted to Flooded Land, and Flooded Land Remaining Flooded Land; and N₂O emissions from forest soils and settlement soils.

f LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements. Since the resulting flux is negative the signs of the resulting lower and upper bounds are reversed.

g The LULUCF Sector Net Total is the net sum of all CH₄ and N₂O emissions to the atmosphere plus net carbon stock changes. Notes: Total emissions (excluding emissions for which uncertainty was not quantified) are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate net sequestration

LULUCF Carbon Stock Change Fluxf	(832.0)	(1,047.1)	(763.3)	26%	-8%	(903)	73
LULUCF Sector Net Total ^g	(754.2)	(968.5)	(685.0)	28%	-9%	(825)	73
Net Emissions (Sources and Sinks)	5,586.0	5,365.4	5,903.0	-4%	6%	5,630	138

^a The lower and upper bounds for emission estimates correspond to a 95 percent confidence interval, with the lower bound corresponding to 2.5th percentile and the upper bound corresponding to 97.5th percentile.

In addition to the estimates of uncertainty associated with the current and base year estimates, Table 1-7 presents the estimates of inventory trend uncertainty. The 2006 IPCC Guidelines defines trend as the difference in emissions between the base year (i.e., 1990) and the current year (i.e., 2021) Inventory estimates. However, for purposes of understanding the concept of trend uncertainty, the trend is defined in this Inventory as the percentage change in the gross emissions (or net emissions) estimated for the current year, relative to the gross emission (or net emissions) estimated for the base year. The uncertainty associated with this trend is referred to as trend uncertainty and is reported as between -7 and 8 percent at the 95 percent confidence level between 1990 and 2021. This indicates a range of approximately -7 percent below and 8 percent above the trend estimate of -0.4 percent. See Annex 7 for trend uncertainty estimates for individual source and sink categories by gas.

Table 1-7: Quantitative Assessment of Trend Uncertainty (MMT CO₂ Eq. and Percent)

	Base Year	2021	Emissions		
Gas/Source	Emissions ^a	Emissions	Trend	Trend R	Rangeb
	(MMT)	(%)	(%)		
				Lower	Upper
				Bound	Bound
CO ₂	5,121.0	5,032.2	-2%	-6%	3%
CH ₄	868.7	727.4	-16%	-24%	-2%
N_2O	406.3	393.3	-3%	-39%	52%
HFCs, PFCs, SF ₆ , and NF ₃	91.4	187.3	105%	86%	147%
Total Gross Emissions ^c	6,487.3	6,340.2	-2%	-7%	3%
LULUCF Emissions ^d	57.9	77.8	34%	19%	51%
LULUCF Carbon Stock Change Fluxe	(938.9)	(832.0)	-11%	-30%	12%
LULUCF Sector Net Totalf	(881.0)	(754.2)	-14%	-33%	10%
Net Emissions (Sources and Sinks) ^c	5,606.4	5,586.0	-0.4%	-7%	8%

^a Base Year is 1990 for all sources.

^b Mean value indicates the arithmetic average of the simulated emission estimates; standard deviation indicates the extent of deviation of the simulated values from the mean.

^c The lower and upper bound emission estimates for the sub-source categories do not sum to total emissions because the low and high estimates for total emissions were calculated separately through simulations.

^d The overall uncertainty estimates did not take into account the uncertainty in the GWP values for CH₄, N₂O and high GWP gases used in the Inventory emission calculations for 2021.

e LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands, Land Converted to Flooded Land, and Flooded Land Remaining Flooded Land; and N₂O emissions from forest soils and settlement soils.

f LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements. Since the resulting flux is negative the signs of the resulting lower and upper bounds are reversed.

 $[^]g$ The LULUCF Sector Net Total is the net sum of all CH $_4$ and N $_2$ O emissions to the atmosphere plus net carbon stock changes. Notes: Total emissions (excluding emissions for which uncertainty was not quantified) are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

^b The trend range represents a 95 percent confidence interval for the emission trend, with the lower bound corresponding to 2.5th percentile value and the upper bound corresponding to 97.5th percentile value.

^c Totals exclude emissions for which uncertainty was not quantified.

 $^{^{\}rm d}$ LULUCF emissions include the CH $_{\rm d}$ and N $_{\rm 2}$ O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH $_{\rm d}$ emissions from Land Converted to

Coastal Wetlands, Land Converted to Flooded Land, and Flooded Land Remaining Flooded Land; and N₂O emissions from forest soils and settlement soils.

^e LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

 $^{\rm f}$ The LULUCF Sector Net Total is the net sum of all CH₄ and N₂O emissions to the atmosphere plus net carbon stock changes. Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration. Total emissions (excluding emissions for which uncertainty was not quantified) are presented without LULUCF. Net emissions are presented with LULUCF.

1.8 Completeness

This report, along with its accompanying CRF tables, serves as a thorough assessment of the anthropogenic sources and sinks of greenhouse gas emissions for the United States for the time series 1990 through 2021. This report is intended to be comprehensive and includes the vast majority of emissions and removals identified as anthropogenic, consistent with IPCC and UNFCCC guidelines. In general, sources or sink categories not accounted for in this Inventory are excluded because they are not occurring in the United States and its territories, or because data are unavailable to develop an estimate and/or the categories were determined to be insignificant ⁴⁰ in terms of overall national emissions per UNFCCC reporting guidelines.

The United States is continually working to improve upon the understanding of such sources and sinks currently not included and seeking to find the data required to estimate related emissions and removals, focusing on categories that are anticipated to be significant. As such improvements are implemented, new emission and removal estimates are quantified and included in the Inventory, improving completeness of national estimates. For a list of sources and sink categories not included and more information on significance of these categories, see Annex 5 and the respective category sections in each sectoral chapter of this report.

1.9 Organization of Report

In accordance with the revision of the UNFCCC reporting guidelines agreed to at the nineteenth Conference of the Parties (UNFCCC 2014), this *Inventory of U.S. Greenhouse Gas Emissions and Sinks* is grouped into five sector-specific chapters consistent with the UN Common Reporting Framework, listed below in Table 1-8. In addition, chapters on Trends in Greenhouse Gas Emissions, Other information, and Recalculations and Improvements to be considered as part of the U.S. Inventory submission are included.

Table 1-8: IPCC Sector Descriptions

Chapter (IPCC Sector)	Activities Included
Energy	Emissions of all greenhouse gases resulting from stationary and mobile energy activities including fuel combustion and fugitive fuel emissions, and non-energy use of fossil fuels.
Industrial Processes and Product Use	Emissions resulting from industrial processes and product use of greenhouse gases.

 $^{^{40}}$ See paragraph 32 of Decision 24/CP.19, the UNFCCC reporting guidelines on annual inventories for Parties included in Annex 1 to the Convention. Paragraph notes that "...An emission should only be considered insignificant if the likely level of emissions is below 0.05 per cent of the national total GHG emissions, and does not exceed 500 kt CO_2 Eq. The total national aggregate of estimated emissions for all gases and categories considered insignificant shall remain below 0.1 percent of the national total GHG emissions."

Agriculture Emissions from agricultural activities except fuel combustion, which is

addressed under Energy.

Land Use, Land-Use Emissions and removals of CO₂, and emissions of CH₄, and N₂O from land use,

Change, and Forestry land-use change and forestry.

Waste Emissions from waste management activities.

Within each chapter, emissions are identified by the anthropogenic activity that is the source or sink of the greenhouse gas emissions being estimated (e.g., coal mining). Overall, the following organizational structure is consistently applied throughout this report:

Chapter/IPCC Sector: Overview of emissions and trends for each IPCC defined sector.

CRF Source or Sink Category: Description of category pathway and emission/removal trends based on IPCC methodologies, consistent with UNFCCC reporting guidelines.

Methodology and Time-Series Consistency: Description of analytical methods (e.g., from 2006 IPCC Guidelines, or country-specific methods) employed to produce emission estimates and identification of data references, primarily for activity data and emission factors, and a discussion of time-series consistency.

Uncertainty: A discussion and quantification of the uncertainty in emission estimates.

QA/QC and **Verification**: A discussion on steps taken to QA/QC and verify the emission estimates, consistent with the U.S. QA/QC plan, and any key QC findings.

Recalculations Discussion: A discussion of any data or methodological changes that necessitate a recalculation of previous years' emission estimates, and the impact of the recalculation on the emission estimates, if applicable.

Planned Improvements: A discussion on any category-specific planned improvements, if applicable.

Special attention is given to CO₂ from fossil fuel combustion relative to other sources because of its share of emissions and its dominant influence on emission trends. For example, each energy consuming end-use sector (i.e., residential, commercial, industrial, and transportation), as well as the electricity generation sector, is described individually. Additional information for certain source categories and other topics is also provided in several Annexes listed in Table 1-9.

Table 1-9: List of Annexes

ANNEX 1 Key Category Analysis

ANNEX 2 Methodology and Data for Estimating CO₂ Emissions from Fossil Fuel Combustion

- 2.1. Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion
- 2.2. Methodology for Estimating the Carbon Content of Fossil Fuels
- 2.3. Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels

ANNEX 3 Methodological Descriptions for Additional Source or Sink Categories

- 3.1. Methodology for Estimating Emissions of CH₄, N₂O, and Indirect Greenhouse Gases from Stationary Combustion
- 3.2. Methodology for Estimating Emissions of CH₄, N₂O, and Indirect Greenhouse Gases from Mobile Combustion and Methodology for and Supplemental Information on Transportation-Related Greenhouse Gas Emissions
- 3.3. Methodology for Estimating Emissions from Commercial Aircraft Jet Fuel Consumption
- 3.4. Methodology for Estimating CH₄ Emissions from Coal Mining
- 3.5. Methodology for Estimating CH₄ and CO₂ Emissions from Petroleum Systems
- 3.6. Methodology for Estimating CH₄ Emissions from Natural Gas Systems
- 3.7. Methodology for Estimating CO₂ and N₂O Emissions from Incineration of Waste
- 3.8. Methodology for Estimating Emissions from International Bunker Fuels used by the U.S. Military
- 3.9. Methodology for Estimating HFC and PFC Emissions from Substitution of Ozone Depleting Substances
- 3.10. Methodology for Estimating CH₄ Emissions from Enteric Fermentation
- 3.11. Methodology for Estimating CH₄ and N₂O Emissions from Manure Management
- 3.12. Methodology for Estimating N₂O Emissions, CH₄ Emissions and Soil Organic C Stock Changes from Agricultural Lands (Cropland and Grassland)

- 3.13. Methodology for Estimating Net Carbon Stock Changes in Forest Land Remaining Forest Land and Land Converted to Forest Land
- 3.14. Methodology for Estimating CH₄ Emissions from Landfills

ANNEX 4 IPCC Reference Approach for Estimating CO₂ Emissions from Fossil Fuel Combustion

ANNEX 5 Assessment of the Sources and Sinks of Greenhouse Gas Emissions Not Included

ANNEX 6 Additional Information

- 6.1. Global Warming Potential Values
- 6.2. Ozone Depleting Substance Emissions
- 6.3. Greenhouse Gas Precursors: Mapping of NEI categories to the Inventory
- 6.4. Constants, Units, and Conversions
- 6.5. Chemical Formulas

ANNEX 7 Uncertainty

- 7.1. Overview
- 7.2. Methodology and Results
- 7.3. Reducing Uncertainty
- 7.4. Planned Improvements
- 7.5. Additional Information on Uncertainty Analyses by Source

ANNEX 8 QA/QC Procedures

- 8.1. Background
- 8.2. Purpose
- 8.3. Assessment Factors
- 8.4. Responses During the Review Process

ANNEX 9 Use of Greenhouse Gas Reporting Program (GHGRP) in Inventory

2. Trends in Greenhouse Gas Emissions and Removals

2.1 Overview of U.S. Greenhouse Gas Emissions and Sinks Trends

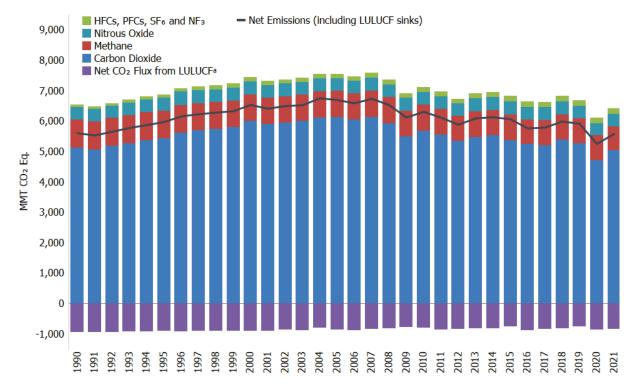
In 2021, total gross U.S. greenhouse gas emissions were 6,340.2 million metric tons of carbon dioxide equivalent (MMT CO₂ Eq.). ¹ Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions increased from 2020 to 2021 by 5.2 percent (314.3 MMT CO₂ Eq.). Net emissions (i.e., including sinks) were 5,586.0 MMT CO₂ Eq. in 2021. Overall, net emissions increased 6.4 percent from 2020 to 2021 and decreased 16.6 percent from 2005 levels, as shown in Table 2-1. Between 2020 and 2021, the increase in total greenhouse gas emissions was driven largely by an increase in CO₂ emissions from fossil fuel combustion due to economic activity rebounding after the height of the COVID-19 pandemic. The CO₂ emissions from fossil fuel combustion increased by 6.8 percent from 2020 to 2021, including a 11.4 percent increase in transportation sector emissions and a 7.0 percent increase in electric power sector emissions. The increase in electric power sector emissions was due in part to an increase in electricity demand of 2.4 percent since 2020. Overall there has been a decrease in electric power sector emissions from 1990 through 2021 which reflects the combined impacts of long-term trends in many factors, including population, economic growth, energy markets, technological changes including energy efficiency, and the carbon intensity of energy fuel choices. Between 2019 and 2021, there was still a decrease of 3.5 percent and 4.1 percent in CO₂ emissions from fossil fuel combustion from the transportation and electric power sectors, respectively.

Figure 2-1 and Figure 2-2 illustrate the overall trend in total U.S. emissions and sinks by gas and annual percent changes relative to the previous year since 1990.

Introduction

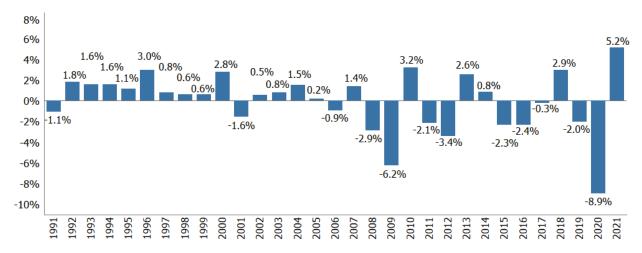
¹ The gross emissions total presented in this report for the United States excludes emissions and sinks from removals from Land Use, Land-Use Change, and Forestry (LULUCF). The net emissions total presented in this report for the United States includes emissions and sinks from removals from LULUCF.

Figure 2-1: U.S. Greenhouse Gas Emissions and Sinks by Gas



 $^{^{3}}$ The term "flux" is used to describe the exchange of CO_{2} to and from the atmosphere, with net flux being either positive or negative depending on the overall balance. Removal and long-term storage of CO_{2} from the atmosphere is also referred to as "carbon sequestration."

Figure 2-2: Annual Percent Change in Gross U.S. Greenhouse Gas Emissions Relative to the Previous Year

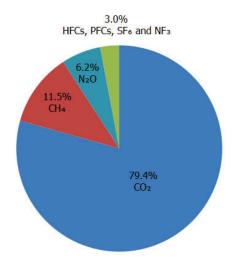


Emissions and Sinks by Gas

Figure 2-3 illustrates the relative contribution of the greenhouse gases to total gross U.S. emissions in 2021, in CO₂-equivalents (i.e., weighted by global warming potential). The primary greenhouse gas emitted by human activities in the United States is CO₂, representing 79.4 percent of total greenhouse gas emissions. The largest source of CO₂,

and of overall greenhouse gas emissions, is fossil fuel combustion primarily from transportation and power generation. Methane (CH₄) emissions account for 11.5 percent of emissions. The major sources of methane include enteric fermentation associated with domestic livestock, natural gas systems, and decomposition of wastes in landfills. Agricultural soil management, wastewater treatment, stationary sources of fuel combustion, and manure management are the major sources of N_2O emissions. Ozone depleting substance (ODS) substitute emissions were the primary contributor to aggregate hydrofluorocarbon (HFC) emissions. Perfluorocarbon (PFC) emissions were primarily attributable to electronics manufacturing and primary aluminum production. Electrical transmission and distribution systems accounted for most sulfur hexafluoride (SF₆) emissions. The electronics industry is the only source of nitrogen trifluoride (NF₃) emissions.

Figure 2-3: 2021 Gross Total U.S. Greenhouse Gas Emissions by Gas (Percentages based on MMT CO_2 Eq.)



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above.

Overall from 1990 to 2021, total emissions of CO_2 decreased by 88.7 MMT CO_2 Eq. (1.7 percent), total emissions of methane (CH₄) decreased by 141.2 MMT CO_2 Eq. (16.3 percent), and total emissions of nitrous oxide (N₂O) decreased by 13.0 MMT CO_2 Eq. (3.2 percent). During the same period, emissions of fluorinated gases including hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃) rose by 95.9 MMT CO_2 Eq. (104.8 percent). Despite being emitted in smaller quantities relative to the other principal greenhouse gases, emissions of HFCs, PFCs, SF₆, and NF₃ are significant because many of them have extremely high global warming potentials (GWPs), and, in the cases of PFCs, SF₆, and NF₃, very long atmospheric lifetimes. Conversely, U.S. greenhouse gas emissions were partly offset by carbon (C) sequestration in managed forests, trees in urban areas, agricultural soils, landfilled yard trimmings, and coastal wetlands. These were estimated to offset 13.1 percent (832.0 MMT CO_2 Eq.) of total gross emissions in 2021.

Table 2-1 provides information on trends in emissions and sinks from all U.S. anthropogenic sources and sinks in weighted units of MMT CO_2 Eq., while unweighted gas emissions and sinks in kilotons (kt) are provided in Table 2-2.

Table 2-1: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO,	5,121.0	6,132.2	5,212.2	5,377.8	5,262.1	4,714.6	5,032.2
Fossil Fuel Combustion	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Transportation	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4
Electric Power Sector	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9

Industrial	852.4	850.8	789.0	813.5	815.9	767.9	775.6
Residential	338.6	358.9	293.4	338.2	341.4	313.2	313.3
Commercial	228.3	227.1	232.0	245.8	250.7	228.5	233.0
U.S. Territories	20.0	51.9	25.9	25.9	24.8	23.3	23.8
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
Iron and Steel Production &							
Metallurgical Coke Production	104.7	70.1	40.8	42.9	43.1	37.7	41.7
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Natural Gas Systems	32.2	25.0	31.9	32.8	38.6	36.5	36.2
Petrochemical Production	21.6	27.4	28.9	29.3	30.7	29.8	33.2
Petroleum Systems	9.5	10.2	24.5	36.1	46.9	29.1	24.7
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-							
Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
Coal Mining	4.6	4.2	3.2	3.1	3.0	2.2	2.5
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and							
Consumption	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Substitution of Ozone Depleting							
Substances	+	+	+	+	+	+	+
Magnesium Production and	0.1	+	+	+	+	+	+
Processing Biomass and Biofuel Consumptiona	237.9	245.4	328.9	336.0	333.1	305.6	315.4
International Bunker Fuels ^b	103.6	113.3	120.2	124.3	333.1 113.6	69.6	80.2
		791.1	762.7			742.2	727.4
CH ₄ ^c	868.7			774.0	767.8		
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Natural Gas Systems Landfills	215.1	203.3	186.2	194.3	193.6	185.3	181.4
	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Manure Management	39.0	54.9	64.4	66.5	65.7	66.7	66.0
Petroleum Systems	51.3	50.9	61.9	60.6	59.9	54.5	50.2
Coal Mining	108.1	71.8	61.4	59.1	53.0	46.2	44.7
Wastewater Treatment	22.7	22.7	21.5	21.4	21.2	21.3	21.1
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Stationary Combustion	9.6	8.8	8.6	9.6	9.8	8.8	8.9
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.2	8.2
Abandoned Underground Coal	0.1	7.4	7.0	C 0	<i>C C</i>	C F	C 4
Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Mobile Combustion	7.2	4.4	2.9	2.9	2.9	2.6	2.6
Composting Field Burning of Agricultural	0.4	2.1	2.7	2.5	2.5	2.6	2.6
Field Burning of Agricultural Residues	0.4	0.5	0.5	0.5	0.5	0.5	0.5
Petrochemical Production	0.4	0.5	0.3	0.3	0.3	0.3	0.3
r eti ochemicai Fi oduction	0.2	0.1	0.5	0.5	0.4	0.5	0.4

Apparable Digastion at Piagas							
Anaerobic Digestion at Biogas Facilities	+	+	0.2	0.2	0.2	0.2	0.2
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and							
Consumption	+	+	+	+	+	+	+
Iron and Steel Production &							
Metallurgical Coke Production	+	+	+	+	+	+	+
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels ^b	0.2	0.1	0.1	0.1	0.1	0.1	0.1
N₂O ^c	406.3	415.8	414.7	430.2	410.3	388.9	393.3
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Stationary Combustion	22.3	30.5	25.3	25.1	22.2	20.7	22.1
Wastewater Treatment	14.8	18.1	20.6	21.2	21.3	20.9	20.9
Manure Management	12.4	14.5	16.9	17.2	17.4	17.5	17.4
Mobile Combustion	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
N₂O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Composting	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Caprolactam, Glyoxal, and Glyoxylic	1.5	1.0	1.2	1.2	1.2	1.2	1.2
Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Electronics Industry Field Burning of Agricultural	+	0.1	0.2	0.2	0.2	0.3	0.3
Residues	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels ^b	0.8	0.9	0.9	1.0	0.9	0.5	0.5
HFCs	39.0	116.4	160.8	160.9	165.4	168.2	175.1
Substitution of Ozone Depleting	55.0						
Substancesd	0.3	99.4	156.1	157.7	161.9	166.1	172.4
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Electronics Industry	0.2	0.2	0.3	0.3	0.3	0.3	0.4
Magnesium Production and							
Processing	NO	NO	0.1	0.1	0.1	0.1	+
PFCs	21.8	6.1	3.8	4.3	4.0	3.9	3.5
Electronics Industry	2.5	3.0	2.7	2.8	2.5	2.4	2.6
Aluminum Production	19.3	3.1	1.0	1.4	1.4	1.4	0.9
Substitution of Ozone Depleting							
Substancesd	NO	+	+	+	+	+	+
Electrical Transmission and Distribution	NO			NO			
	NO 30.5	+ 15.5	+ 7.2	NO 7.1	+ 7.8	+ 7.5	+ 8.0
SF _e Electrical Transmission and	30.3	15.5	7.2	7.1	7.0	7.5	8.0
Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
Magnesium Production and	21.7	11.0	3.3	3.2	0.1	3.3	0.0
Processing	5.4	2.9	1.0	1.1	0.9	0.9	1.1
Electronics Industry	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF,	+	0.4	0.5	0.5	0.5	0.6	0.6
Electronics Industry	+	0.4	0.5	0.5	0.5	0.6	0.6
Total Gross Emissions (Sources)	6,478.3	7,477.4	6,561.8	6,754.8	6,617.9	6,026.0	6,340.2
LULUCF Emissions ^c	57.9	72.4	68.3	64.4	64.2	76.4	77.8
CH ₄	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N ₂ O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Changee	(938.9)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
LULUCF Sector Net Totalf	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)

Net Emissions (Sources and Sinks)	5,606.4	6,696.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Notes: Total (gross) emissions are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Table 2-2: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	5,120,957	6,132,183	5,212,162	5,377,797	5,262,145	4,714,628	5,032,213
Fossil Fuel Combustion	4,728,194	5,747,307	4,852,515	4,989,849	4,855,930	4,344,906	4,639,073
Transportation	1,468,944	1,858,552	1,780,103	1,812,903	1,816,397	1,572,525	1,752,427
Electric Power Sector	1,819,951	2,400,057	1,732,033	1,753,432	1,606,721	1,439,563	1,540,897
Industrial	852,429	850,812	789,023	813,534	815,894	767,898	775,604
Residential	338,568	358,898	293,410	338,218	341,400	313,175	313,339
Commercial	228,293	227,130	231,999	245,838	250,703	228,463	233,031
U.S. Territories	20,011	51,858	25,947	25,924	24,815	23,281	23,774
Non-Energy Use of Fuels	112,407	128,920	112,841	129,441	127,621	119,208	140,197
Iron and Steel Production &							
Metallurgical Coke							
Production	104,737	70,076	40,810	42,858	43,090	37,712	41,656
Cement Production	33,484	46,194	40,324	38,971	40,896	40,688	41,312
Natural Gas Systems	32,207	25,033	31,864	32,815	38,563	36,463	36,161
Petrochemical Production	21,611	27,383	28,890	29,314	30,702	29,780	33,170
Petroleum Systems	9,519	10,221	24,462	36,102	46,874	29,081	24,669
Incineration of Waste	12,900	13,254	13,161	13,339	12,948	12,921	12,476
Ammonia Production	14,404	10,234	12,481	12,669	12,401	13,006	12,207
Lime Production	11,700	14,552	12,882	13,106	12,112	11,299	11,870
Other Process Uses of							
Carbonates	6,233	7,459	9,869	7,351	8,422	8,399	7,951
Urea Fertilization	2,417	3,504	4,862	4,939	5,030	5,122	5,214
Carbon Dioxide Consumption	1,472	1,375	4,580	4,130	4,870	4,970	4,990
Urea Consumption for Non-							
Agricultural Purposes	3,784	3,653	5,161	6,111	6,154	5,814	4,989
Liming	4,690	4,351	3,069	2,240	2,203	2,915	3,047
Coal Mining	4,606	4,170	3,153	3,141	2,992	2,198	2,456
Glass Production	1,928	2,402	1,984	1,989	1,940	1,858	1,969
Soda Ash Production	1,431	1,655	1,753	1,714	1,792	1,461	1,714
Ferroalloy Production	2,152	1,392	1,975	2,063	1,598	1,377	1,567
Aluminum Production	6,831	4,142	1,205	1,455	1,880	1,748	1,541

NO (Not Occurring)

^a Emissions from biomass and biofuel consumption are not included specifically in Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

^b Emissions from international bunker fuels are not included in totals.

 $^{^{\}rm c}$ LULUCF emissions of CH $_4$ and N $_2$ O are reported separately from gross emissions totals. LULUCF emissions include the CH $_4$ and N $_2$ O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH $_4$ emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N $_2$ O emissions from forest soils and settlement soils. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category. $^{\rm d}$ Small amounts of PFC emissions also result from this source.

^e LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category.

f The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes.

Titanium Dioxide Production	1,195	1,755	1,688	1,541	1,474	1,193	1,474
Zinc Production	632	1,030	900	999	1,026	977	969
Phosphoric Acid Production	1,529	1,342	1,025	937	909	901	909
Lead Production	516	553	513	527	531	464	446
Carbide Production and							
Consumption	243	213	181	184	175	154	172
Abandoned Oil and Gas Wells	7	7	7	7	8	7	7
Substitution of Ozone							
Depleting Substances	+	1	3	3	3	4	4
Magnesium Production and							
Processing	128	3	3	2	2	3	3
Biomass and Biofuel							
Consumption ^a	237,946	245,421	328,888	335,973	333,059	305,562	315,353
International Bunker Fuels ^b	103,634	113,328	120,192	124,279	113,632	69,638	80,180
CH ₄ ^c	31,024	28,252	27,238	27,644	27,421	26,509	25,980
Enteric Fermentation	6,539	6,722	6,998	7,028	7,046	7,007	6,962
Natural Gas Systems	7,680	7,260	6,652	6,939	6,914	6,619	6,478
Landfills	7,063	5,275	4,424	4,525	4,607	4,456	4,379
Manure Management	1,394	1,960	2,300	2,375	2,348	2,383	2,358
Petroleum Systems	1,833	1,819	2,209	2,165	2,138	1,945	1,791
Coal Mining	3,860	2,566	2,192	2,110	1,893	1,648	1,595
Wastewater Treatment	811	809	770	763	755	761	753
Rice Cultivation	640	720	596	623	602	630	600
Stationary Combustion	344	313	307	344	351	313	319
Abandoned Oil and Gas Wells	274	289	295	296	297	295	295
Abandoned Underground							
Coal Mines	288	264	257	247	237	232	228
Mobile Combustion	258	158	105	102	103	92	93
Composting	15	75	98	90	91	92	92
Field Burning of Agricultural							
Residues	15	17	17	17	17	17	17
Petrochemical Production	9	3	10	12	13	12	15
Anaerobic Digestion at Biogas							
Facilities	1	2	6	6	6	6	6
Ferroalloy Production	1	+	1	1	+	+	+
Carbide Production and							
Consumption	1	+	+	+	+	+	+
Iron and Steel Production &							
Metallurgical Coke							
Production	1	1	+	+	+	+	+
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels ^b	7	5	4	4	4	3	3
N₂O ^c	1,533	1,569	1,565	1,623	1,548	1,468	1,484
Agricultural Soil Management	1,087	1,100	1,172	1,222	1,167	1,096	1,110
Stationary Combustion	84	115	95	95	84	78	84
Wastewater Treatment	56	68	78	80	80	79	79
Manure Management	47	55	64	65	65	66	66
Mobile Combustion	145	140	70	66	72	61	63
Nitric Acid Production	41	38	31	32	34	31	30
Adipic Acid Production	51	24	25	35	18	28	25
N₂O from Product Uses	14	14	14	14	14	14	14
Composting	1	6	7	7	7	7	7
Caprolactam, Glyoxal, and							
Glyoxylic Acid Production	6	7	5	5	5	4	5
Incineration of Waste	2	1	1	1	1	1	1

Electronics Industry	+	+	1	1	1	1	1
Field Burning of Agricultural							
Residues	1	1	1	1	1	1	1
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels ^b	3	3	4	4	3	2	2
HFCs	M	М	М	M	M	M	M
Substitution of Ozone							
Depleting Substancesd	M	М	M	M	M	M	M
HCFC-22 Production	3	1	+	+	+	+	+
Electronics Industry	M	М	M	M	M	M	M
Magnesium Production and							
Processing	NO	NO	+	+	+	+	+
PFCs	M	М	М	M	M	M	M
Electronics Industry	M	М	M	M	M	M	M
Aluminum Production	M	М	M	M	M	M	M
Substitution of Ozone							
Depleting Substancesd	+	+	+	+	+	+	+
Electrical Transmission and							
Distribution	+	+	+	+	+	+	+
SF ₆	1	1	+	+	+	+	+
Electrical Transmission and							
Distribution	1	1	+	+	+	+	+
Magnesium Production and							
Processing	+	+	+	+	+	+	+
Electronics Industry	+	+	+	+	+	+	+
NF ₃	+	+	+	+	+	+	+
Electronics Industry	+	+	+	+	+	+	+
СО	133,225	78,095	41,290	38,980	39,105	42,375	43,980
NO _x	22,889	19,768	8,424	8,052	7,684	6,909	6,995
SO ₂	20,935	13,108	2,093	2,001	1,676	1,471	1,628
NMVOCs	20,918	12,708	8,951	8,987	8,804	9,040	9,037

⁺ Does not exceed 0.5 kt.

M (Mixture of multiple gases)

NO (Not Occurring)

Notes: Totals by gas may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Emissions by IPCC Sector

Emissions and removals of all gases can be summed from each source and sink category into a set of five sectors defined by the UNFCCC Reporting Guidelines and methodological framework provided by the Intergovernmental Panel on Climate Change (IPCC). Figure 2-4 and Table 2-3 illustrate that over the thirty-two-year period of 1990 to 2021, total emissions from the Energy and Waste sectors decreased by 171.4 MMT CO_2 Eq. (3.2 percent) and 66.8 MMT CO_2 Eq. (28.3 percent), respectively. Emissions from Industrial Processes and Product Use and Agriculture grew by 41.0 MMT CO_2 Eq. (12.2 percent) and 50.0 MMT CO_2 Eq. (9.1 percent), respectively. Over the same period, total C sequestration in the Land Use, Land-Use Change, and Forestry (LULUCF) sector decreased by 106.8 MMT CO_2 (11.4 percent decrease in total C sequestration), and emissions from the LULUCF sector increased by 19.9 MMT CO_2 Eq. (34.4 percent).

^a Emissions from biomass and biofuel consumption are not included specifically in Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

^b Emissions from international bunker fuels are not included in totals.

^cLULUCF emissions of LULUCF CH₄ and N₂O are reported separately from gross emissions totals. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category.

^d Small amounts of PFC emissions also result from this source.

Figure 2-4: U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector

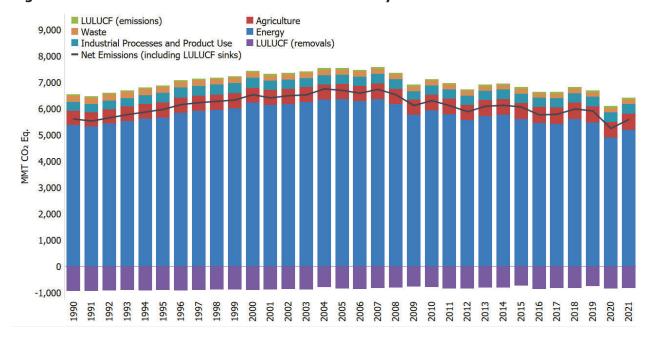


Table 2-3: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector/Category (MMT CO_2 Eq.)

IPCC Sector/Category	1990	2005	2017	2018	2019	2020	2021
Energy	5,368.0	6,351.5	5,418.7	5,589.5	5,460.6	4,894.0	5,196.6
Fossil Fuel Combustion	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Natural Gas Systems	247.3	228.3	218.1	227.1	232.2	221.8	217.5
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
Petroleum Systems	60.8	61.2	86.4	96.8	106.8	83.6	74.9
Coal Mining	112.7	76.0	64.5	62.2	56.0	48.3	47.1
Stationary Combustion ^a	31.9	39.3	33.9	34.7	32.0	29.4	31.1
Mobile Combustiona	45.6	41.4	21.5	20.4	21.9	18.7	19.3
Incineration of Waste	13.3	13.6	13.5	13.7	13.3	13.3	12.8
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.3	8.3
Abandoned Underground Coal Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Biomass and Biofuel Consumption ^b	237.9	245.4	328.9	336.0	333.1	305.6	315.4
International Bunker Fuels ^c	104.6	114.3	121.2	125.3	114.6	70.3	80.9
Industrial Processes and Product Use	335.4	356.1	359.1	362.2	366.8	363.2	376.4
Substitution of Ozone Depleting							
Substances	0.3	99.4	156.1	157.8	162.0	166.1	172.5
Iron and Steel Production &							
Metallurgical Coke Production	104.8	70.1	40.8	42.9	43.1	37.7	41.7
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Petrochemical Production	21.9	27.5	29.2	29.7	31.1	30.1	33.6
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
Electrical Transmission and							
Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0

Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-							
Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Electronics Industry	3.3	4.5	4.6	4.7	4.3	4.4	4.8
N₂O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Aluminum Production	26.1	7.2	2.2	2.9	3.3	3.2	2.5
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Caprolactam, Glyoxal, and Glyoxylic							
Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Magnesium Production and							
Processing	5.5	2.9	1.1	1.1	1.0	0.9	1.2
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and Consumption	0.3	0.2	0.2	0.2	0.2	0.2	0.2
Agriculture	548.0	577.7	613.1	629.5	614.5	597.3	598.1
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Manure Management	51.4	69.4	81.3	83.7	83.1	84.2	83.4
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
Field Burning of Agricultural Residues	0.6	0.7	0.7	0.6	0.6	0.6	0.6
Waste	236.0	192.1	170.9	173.7	176.0	171.5	169.2
Landfills	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Wastewater Treatment	37.5	40.7	42.2	42.5	42.5	42.2	42.0
Composting	0.7	3.6	4.7	4.3	4.3	4.4	4.4
Anaerobic Digestion at Biogas							
Facilities	+	+	0.2	0.2	0.2	0.2	0.2
Total Gross Emissions ^d (Sources)	6,487.3	7,477.4	6,561.8	6,754.8	6,617.9	6,026.0	6,340.2
LULUCF Sector Net Totale	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Forest Land	(914.2)	(793.9)	(793.5)	(791.2)	(736.3)	(782.2)	(768.7)
Cropland	31.6	25.6	34.3	39.7	41.7	33.4	37.6
Grassland	2.2	(28.4)	(12.9)	(12.3)	(8.7)	(19.3)	(14.0)
Wetlands	44.8	44.4	42.7	42.6	42.6	42.4	42.4
Settlements	(45.3)	(28.9)	(44.7)	(44.0)	(43.4)	(50.5)	(51.4)
Net Emission (Sources and Sinks) ^f	5,606.4	6,696.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Notes: Total (gross) emissions are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

 $^{^{\}text{a}}$ Includes CH_{4} and N_{2}O emissions from fuel combustion.

^b Emissions from biomass and biofuel consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

^c Emissions from international bunker fuels are not included in totals.

^d Total emissions without LULUCF.

e LULUCF emissions of CH₄ and N₂O are reported separately from gross emissions totals. LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N₂O emissions from forest soils and settlement soils. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category.

f Net emissions with LULUCF.

Energy

Emissions from energy-related activities come from two main categories, including direct emissions associated with fuel use (i.e., fossil fuel combustion, non-energy use of fossil fuels and waste combustion) and fugitive emissions mainly from coal, natural gas, and oil production. Energy emissions also include some categories that are not added to energy sector totals but are instead presented as memo items, including international bunker fuels and biomass emissions. Energy-related activities, primarily fossil fuel combustion, accounted for the vast majority of U.S. CO₂ emissions for the period of 1990 through 2021. Fossil fuel combustion is the largest source of energy-related emissions, with CO₂ being the primary gas emitted (see Figure 2-5). Due to their relative importance, fossil fuel combustion-related CO₂ emissions are considered in detail in the Energy chapter (see Chapter 3).

In 2021, 79.3 percent of the energy used in the United States on a Btu basis was produced through the combustion of fossil fuels. The remaining 20.7 percent came from other energy sources such as hydropower, biomass, nuclear, wind, and solar energy. A discussion of specific trends related to CO₂ and other greenhouse gas emissions from energy use is presented here with more detail in the Energy chapter. Energy-related activities are also responsible for CH₄ and N₂O emissions (41.6 percent and 10.0 percent of total U.S. emissions of each gas, respectively). Table 2-4 presents greenhouse gas emissions from the Energy chapter by source and gas.

Figure 2-5: Trends in Energy Sector Greenhouse Gas Sources

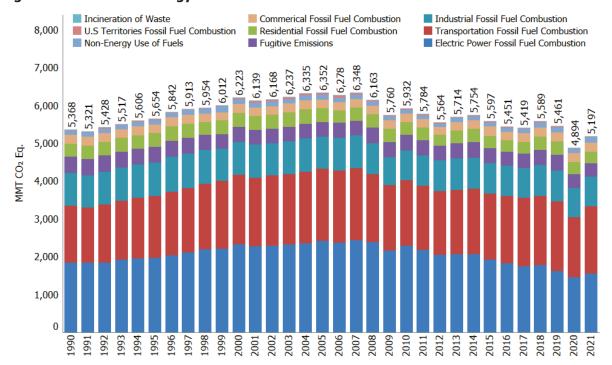


Table 2-4: Emissions from Energy (MMT CO₂ Eq.)²

Gas/Source	1990	2005		2017	2018	2019	2020	2021
CO ₂	4,899.8	5,928.9	5	5,038.0	5,204.7	5,084.9	4,544.8	4,855.0
Fossil Fuel Combustion	4,728.2	5,747.3	4	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Transportation	1,468.9	1,858.6	1	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4
Electricity Generation	1,820.0	2,400.1	1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9
Industrial	852.4	850.8		789.0	813.5	815.9	767.9	775.6

² The full time series data is available in Common Reporting Format (CRF) Tables included in the U.S. UNFCCC submission and in CSV format available at https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

Total	5,368.0	6,351.5	5,418.7	5,589.5	5,460.6	4,894.0	5,196.6
International Bunker Fuels ^b	0.8	0.9	0.9	1.0	0.9	0.5	0.6
Natural Gas Systems	+	+	+	+	+	+	+
Petroleum Systems	+	+	+	+	+	+	+
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Mobile Combustion	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Stationary Combustion	22.3	30.5	25.3	25.1	22.2	20.7	22.1
N₂O	61.1	67.9	44.2	43.1	41.6	37.2	39.2
International Bunker Fuels ^b	0.2	0.1	0.1	0.1	0.1	0.1	0.1
Incineration of Waste	+	+	+	+	+	+	+
Mobile Combustion	7.2	4.4	2.9	2.9	2.9	2.6	2.6
Mines							
Abandoned Underground Coal	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.2	8.2
Stationary Combustion	9.6	8.8	8.6	9.6	9.8	8.8	8.9
Coal Mining	108.1	71.8	61.4	59.1	53.0	46.2	44.7
Petroleum Systems	51.3	50.9	61.9	60.6	59.9	54.5	50.2
Natural Gas Systems	215.1	203.3	186.2	194.3	193.6	185.3	181.4
CH ₄	407.0	354.7	336.5	341.7	334.1	312.0	302.3
Biomass-MSW ^a	18.5	14.7	16.1	16.1	15.7	15.6	15.3
Biofuels-Biodiesel ^a	0.0	0.9	18.7	17.9	17.1	17.7	16.1
Biofuels-Ethanol ^a	4.2	22.9	82.1	81.9	82.6	71.8	79.1
International Bunker Fuels ^b	103.6	113.3	120.2	124.3	113.6	69.6	80.2
Biomass-Wood ^a	215.2	206.9	212.0	220.0	217.7	200.4	204.8
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Coal Mining	4.6	4.2	3.2	3.1	3.0	2.2	2.5
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Petroleum Systems	9.5	10.2	24.5	36.1	46.9	29.1	24.7
Natural Gas Systems	32.2	25.0	31.9	32.8	38.6	36.5	36.2
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
U.S. Territories	20.0	51.9	25.9	25.9	24.8	23.3	23.8
Commercial	228.3	227.1	232.0	245.8	250.7	228.5	233.0
Residential	338.6	358.9	293.4	338.2	341.4	313.2	313.3

⁺ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Fossil Fuel Combustion CO₂ Emissions

As the largest contributor to U.S. greenhouse gas emissions, CO₂ from fossil fuel combustion has accounted for approximately 74.8 percent of CO₂-equivalent total gross emissions on average across the time series. Within the United States, fossil fuel combustion accounted for 92.2 percent of CO₂ emissions in 2021. Emissions from this source category include CO₂ associated with the combustion of fossil fuels (coal, natural gas, and petroleum) for energy use. Fossil fuel combustion CO₂ emissions decreased by 1.9 percent (89.1 MMT CO₂ Eq.) from 1990 to 2021 and were responsible for most of the decrease in national emissions during this period. Similarly, CO₂ emissions from fossil fuel combustion have decreased by 1,108.2 MMT CO₂ Eq. since 2005, representing a decrease of 19.3 percent. From 2020 to 2021, these emissions increased by 6.8 percent (294.2 MMT CO₂ Eq.). Historically, changes in emissions from fossil fuel combustion have been the main factor influencing U.S. emission trends.

Changes in CO₂ emissions from fossil fuel combustion since 1990 are affected by many long-term and short-term factors, including population and economic growth, energy price fluctuations and market trends, technological

^a Emissions from biomass and biofuel consumption are not included specifically in Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

^b Emissions from international bunker fuels are not included in totals. These values are presented for informational purposes only, in line with the *2006 IPCC Guidelines* and UNFCCC reporting obligations.

changes, carbon intensity of energy fuel choices, and seasonal temperatures. Carbon dioxide emissions from coal combustion gradually increased between 1990 and 2007, then began to decrease at a faster rate from 2008 to 2021. Carbon dioxide emissions from natural gas combustion remained relatively constant, with a slight increase between 1990 and 2009, then began to consistently increase between 2010 and 2019. The replacement of coal combustion with natural gas combustion was largely driven by new discoveries of natural gas fields and advancements in drilling technologies, which led to more competitive natural gas prices. On an annual basis, the overall consumption and mix of fossil fuels in the United States fluctuates primarily in response to changes in general economic conditions, overall energy prices, the relative price of different fuels, weather, and the availability of non-fossil alternatives. For example, coal consumption for electric power is influenced by a number of factors, including the relative price of coal and alternative sources, the ability to switch fuels, and longer-term trends in coal markets. Between 2020 and 2021, coal consumption for electric power increased 15.4 percent, a reversal of the overall trend since 2008. However, this followed a 19.2 percent reduction in coal generation between 2019 and 2020 due in part to the COVID-19 pandemic reducing overall demand for fossil fuels across all sectors. There has been a 35.8 percent reduction in overall CO₂ emissions from electric power generation from 2005 to 2021 (see Figure 2-7), reflecting the continued shift in the share of electric power generation from coal to natural gas and renewables since 2005.

Fossil fuel combustion CO2 emissions also depend on the type of fuel consumed or energy used and its carbon intensity. Producing a unit of heat or electricity using natural gas instead of coal, for example, reduces CO2 emissions because of the lower C content of natural gas (see Table 3-12 in Chapter 3 for more detail on electricity generation by source and see Table A-19 in Annex 2.1 for more detail on the C content coefficient of different fossil fuels).

Petroleum use is another major driver of CO₂ emissions from fossil fuel combustion, particularly in the transportation sector, which has represented the largest source of CO₂ emissions from fossil fuel combustion since 2017. Emissions from petroleum consumption for transportation increased by 11.5 percent from 2020 to 2021. This trend can be primarily attributed to a 8.1 percent increase in vehicle miles traveled (VMT) from 2020 to 2021 due to the gradual recovery from the COVID-19 pandemic, which limited travel in 2020. From 2019 to 2021, emissions from petroleum consumption for transportation decreased by 4.0 percent following a decrease of 3.7 percent in VMT over that time period. Fuel economy of light-duty vehicles is another important factor. The decline in new light-duty vehicle fuel economy between 1990 and 2004 reflected the increasing market share of light-duty trucks, which grew from about 29.6 percent of new vehicle sales in 1990 to 48.0 percent in 2004. Starting in 2005, average new vehicle fuel economy began to increase while light-duty VMT grew only modestly for much of the period and has slowed the rate of increase of CO₂ emissions.

Overall, across all sectors, there was a 6.8 percent increase in total CO₂ emissions from fossil fuel combustion from 2020 to 2021.

Trends in CO₂ emissions from fossil fuel combustion, separated by end-use sector, are presented in Table 2-5 and Figure 2-6 based on the underlying U.S. energy consumer data collected by the U.S. Energy Information Administration (EIA). Figure 2-7 further describes trends in direct and indirect CO2 emissions from fossil fuel combustion, separated by end-use sector. Estimates of CO2 emissions from fossil fuel combustion are calculated from these EIA "end-use sectors" based on total fuel consumption and appropriate fuel properties described below. (Any additional analysis and refinement of the EIA data is further explained in the Energy chapter of this report.)

- Transportation. EIA's fuel consumption data for the transportation sector consists of all vehicles whose primary purpose is transporting people and/or goods from one physical location to another.
- Electric Power. EIA's fuel consumption data for the electric power sector are comprised of electricity-only and combined-heat-and-power (CHP) plants within the North American Industry Classification System (NAICS) 22 category whose primary business is to sell electricity, or electricity and heat, to the public. (Non-utility power producers are included in this sector as long as they meet the electric power sector definition.)

- Industry. EIA statistics for the industrial sector include fossil fuel consumption that occurs in the fields of
 manufacturing, agriculture, mining, and construction. EIA's fuel consumption data for the industrial sector
 consist of all facilities and equipment used for producing, processing, or assembling goods. (EIA includes
 generators that produce electricity and/or useful thermal output primarily to support on-site industrial
 activities in this sector.)
- Residential. EIA's fuel consumption data for the residential sector consist of living quarters for private households.
- Commercial. EIA's fuel consumption data for the commercial sector consist of service-providing facilities and equipment from private and public organizations and businesses. (EIA includes generators that produce electricity and/or useful thermal output primarily to support the activities at commercial establishments in this sector.)

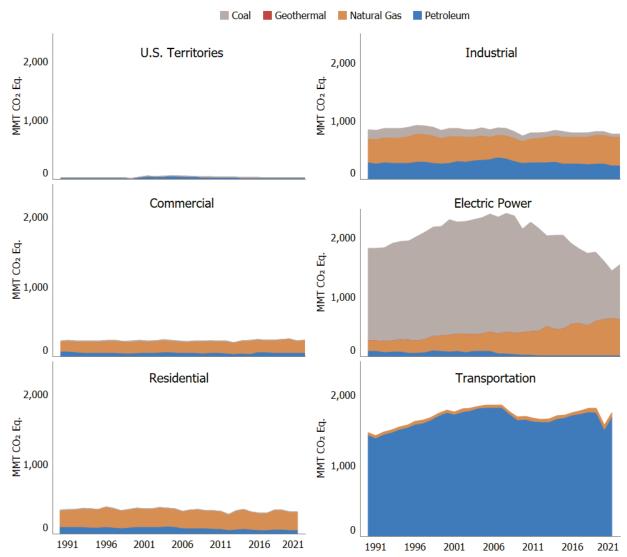
Table 2-5: CO₂ Emissions from Fossil Fuel Combustion by End-Use Sector (MMT CO₂ Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	1,472.0	1,863.3	1,784.4	1,817.7	1,821.2	1,576.6	1,757.4
Combustion	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4
Electricity	3.0	4.7	4.3	4.8	4.8	4.1	5.0
Industrial	1,538.9	1,587.1	1,293.4	1,314.9	1,281.4	1,177.7	1,220.7
Combustion	852.4	850.8	789.0	813.5	815.9	767.9	775.6
Electricity	686.4	736.3	504.4	501.3	465.5	409.8	445.1
Residential	931.3	1,214.9	910.5	980.5	925.1	858.5	885.6
Combustion	338.6	358.9	293.4	338.2	341.4	313.2	313.3
Electricity	592.7	856.0	617.1	642.3	583.7	545.3	572.2
Commercial	766.0	1,030.1	838.2	850.9	803.4	708.8	751.6
Combustion	228.3	227.1	232.0	245.8	250.7	228.5	233.0
Electricity	537.7	803.0	606.2	605.0	552.7	480.3	518.5
U.S. Territories ^a	20.0	51.9	25.9	25.9	24.8	23.3	23.8
Total	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Electric Power	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9

^a Fuel consumption by U.S. Territories (i.e., American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other outlying U.S. Pacific Islands) is included in this report.

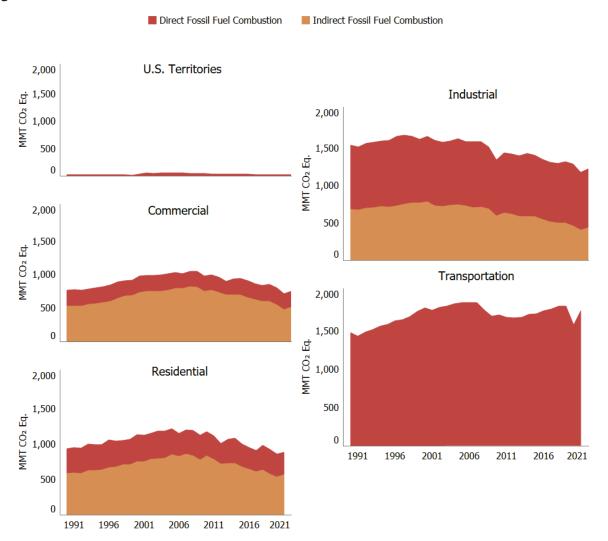
Notes: Combustion-related emissions from electric power are allocated based on aggregate national electricity use by each end-use sector. Totals may not sum due to independent rounding.

Figure 2-6: Trends in CO_2 Emissions from Fossil Fuel Combustion by End-Use Sector and Fuel Type



Note: Fossil Fuel Combustion for electric power also includes emissions of less than 0.5 MMT CO₂ Eq. from geothermal-based generation.

Figure 2-7: Trends in End-Use Sector Emissions of CO₂ from Fossil Fuel Combustion



Electric power was the second largest emitter of CO_2 in 2021 (surpassed by transportation in 2017); electric power generators used 30.7 percent of U.S. energy from fossil fuels and emitted 33.2 percent of the CO_2 from fossil fuel combustion in 2021. Changes in electricity demand and the carbon intensity of fuels used for electric power generation have a significant impact on CO_2 emissions. Carbon dioxide emissions from fossil fuel combustion from the electric power sector have decreased by 15.3 percent since 1990, and the carbon intensity of the electric power sector, in terms of CO_2 Eq. per QBtu input, has significantly decreased by 24.9 percent during that same timeframe. This decoupling of electric power generation and the resulting CO_2 emissions is shown below in Figure 2-8.

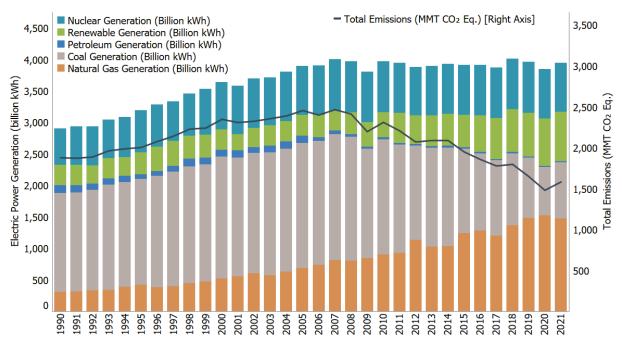


Figure 2-8: Electric Power Generation (Billion kWh) and Emissions (MMT CO₂ Eq.)

Electric power CO₂ emissions can also be allocated to the end-use sectors that use electricity, as presented in Table 2-5. With electricity CO₂ emissions allocated to end-use sectors, the transportation end-use sector represents the largest source of fossil fuel combustion emissions accounting for 1,757.4 MMT CO₂ Eq. in 2021 or 37.9 percent of total CO₂ emissions from fossil fuel combustion. The industrial end-use sector accounted for 24.8 percent of CO₂ emissions from fossil fuel combustion when including allocated electricity emissions. The residential and commercial end-use sectors accounted for 19.1 and 16.2 percent, respectively, of CO₂ emissions from fossil fuel combustion when including allocated electricity emissions. Both of these end-use sectors were heavily reliant on electricity for meeting energy needs, with electricity use for lighting, heating, air conditioning, and operating appliances contributing 64.6 and 69.0 percent of emissions from the residential and commercial end-use sectors, respectively.

Other Significant Energy Sector Trends

Energy sector emissions increased 6.2 percent since 2020 and decreased 3.2 percent since 1990. Other significant trends in emissions from energy source categories (Figure 2-6 and Figure 2-7) over the thirty-two-year period from 1990 through 2021 included the following:

Methane emissions from natural gas systems and petroleum systems (combined here) decreased 34.8 MMT CO₂ Eq. (13.1 percent) from 1990 to 2021, from 266.4 MMT CO₂ Eq. in 1990 to 231.5 MMT CO₂ Eq. in 2021. Natural gas systems CH₄ emissions have decreased by 33.7 MMT CO₂ Eq. (15.7 percent) since 1990, largely due to a decrease in emissions from distribution, transmission and storage, processing, and exploration. The decrease in distribution is largely due to decreased emissions from pipelines and distribution station leaks, and the decrease in transmission and storage emissions is largely due to reduced compressor station emissions (including emissions from compressors and leaks). At the same time, emissions from the natural gas production segment increased. Methane emissions from natural gas systems decreased 2.1 percent between 2020 and 2021. Petroleum systems CH₄ emissions decreased by 1.2 MMT CO₂ Eq. (or 2.2 percent) since 1990 and 7.9 percent between 2020 and 2021. This decrease is due primarily to decreases in emissions from offshore platforms, tanks, and pneumatic controllers. Carbon dioxide emissions from natural gas and petroleum systems increased by 19.1 MMT CO₂ Eq. (45.8 percent) from 1990 to 2021. This increase is due primarily to increases in the production segment, where

flaring emissions from associated gas flaring, tanks, and miscellaneous production flaring have increased over time.

- Methane emissions from coal mining decreased by 63.4 MMT CO₂ Eq. (58.7 percent) from 1990 through 2021 and by 3.2 percent between 2020 and 2021 primarily due to a decrease in the number of active mines and annual coal production over this time period.
- Nitrous oxide emissions from mobile combustion decreased by 21.7 MMT CO₂ Eq. (56.6 percent) from 1990 through 2021, primarily as a result of national vehicle criteria pollutant emissions standards and emission control technologies for on-road vehicles. Emissions increased by 0.6 MMT CO₂ Eq. (3.5 percent) between 2020 and 2021 due to a gradual rebound in travel activity since the reduced travel seen in 2020 due to the COVID-19 pandemic.
- Nitrous oxide emissions from stationary combustion were the second largest source of anthropogenic N₂O emissions in 2021, accounting for 22.1 MMT CO₂ Eq. (5.6 percent of N₂O emissions) and 0.3 percent of total gross U.S. greenhouse gas emissions in 2021. Stationary combustion emissions peaked in 2007, and have steadily decreased since then.
- Carbon dioxide emissions from non-energy uses of fossil fuels increased by 27.8 MMT CO₂ Eq. (24.7 percent) from 1990 through 2021, and 17.6 percent (21.0 MMT CO₂ Eq.) between 2020 and 2021.
 Emissions from non-energy uses of fossil fuels were 140.2 MMT CO₂ Eq. in 2021, which constituted 2.8 percent of total national CO₂ emissions, approximately the same proportion as in 1990.
- Carbon dioxide emissions from incineration of waste (12.5 MMT CO₂ Eq. in 2021) decreased slightly by 0.4 MMT CO₂ Eq. (3.3 percent) from 1990 through 2021, as the volume of scrap tires and other fossil C-containing materials in waste decreased. Emissions decreased 0.4 MMT CO₂ Eq. (3.3 percent) between 2020 and 2021, consistent with trends across the time series.

Industrial Processes and Product Use

Greenhouse gases can be generated and emitted by industry in two different ways. First, they are generated and emitted as the byproducts of many non-energy-related industrial activities. For example, industrial processes can chemically or physically transform raw materials, which often release waste gases such as CO₂, CH₄, N₂O, and fluorinated gases (e.g., HFC-23). In the case of byproduct emissions, the emissions are generated by an industrial process itself, and are not directly a result of energy consumed during the process.

Second, industrial manufacturing processes and use by end-consumers also release HFCs, PFCs, SF₆, and NF₃ and other man-made compounds. In addition to the use of HFCs and some PFCs as substitutes for ozone depleting substances (ODS), fluorinated compounds such as HFCs, PFCs, SF₆, NF₃, and others are also emitted through use by a number of other industrial sources in the United States. These industries include the electronics industry, electric power transmission and distribution, and magnesium metal production and processing. In addition, N₂O is used in and emitted by the electronics industry and anesthetic and aerosol applications, and CO_2 is consumed and emitted through various end-use applications.

Emission sources in the Industrial Processes and Product Use (IPPU) chapter accounted for 5.9 percent of U.S. greenhouse gas emissions in 2021. Emissions from the IPPU sector increased by 12.2 percent from 1990 to 2021. The use of HFCs and PFCs as substitutes for ODS is the largest source of emissions in this sector, contributing 45.8 percent of IPPU emissions in 2021. Total emissions from IPPU increased 3.6 percent between 2020 and 2021, reversing the emissions reduction trend in 2020 from reduced industrial activity due to the COVID-19 pandemic. Despite the sectoral increase in emissions, emissions from aluminum, ammonia, lead, zinc, adipic acid, and nitric acid production all decreased from 2020 to 2021, along with emissions from other process uses of carbonates and urea consumption for non-agricultural purposes. Figure 2-9 presents greenhouse gas emissions from IPPU by source category.

Figure 2-9: Trends in Industrial Processes and Product Use Sector Greenhouse Gas Sources

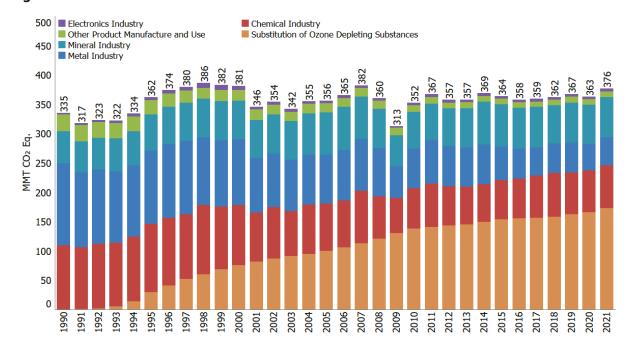


Table 2-6: Emissions from Industrial Processes and Product Use (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	214.0	195.4	166.2	165.9	170.0	161.8	168.9
Iron and Steel Production & Metallurgical Coke							
Production	104.7	70.1	40.8	42.9	43.1	37.7	41.7
Iron and Steel Production	99.1	66.2	38.8	41.6	40.1	35.4	38.4
Metallurgical Coke Production	5.6	3.9	2.0	1.3	3.0	2.3	3.2
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Petrochemical Production	21.6	27.4	28.9	29.3	30.7	29.8	33.2
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-Agricultural							
Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and Consumption	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Substitution of Ozone Depleting Substances ^a	+	+	+	+	+	+	+
Magnesium Production and Processing	0.1	+	+	+	+	+	+
CH ₄	0.3	0.1	0.3	0.4	0.4	0.4	0.4
Petrochemical Production	0.2	0.1	0.3	0.3	0.4	0.3	0.4
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and Consumption	+	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke							
Production	+	+	+	+	+	+	+

Iron and Steel Production	+	+	+	+	+	+	+
Metallurgical Coke Production	NO						
N ₂ O	29.6	22.2	20.2	23.1	18.7	20.8	19.7
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
N₂O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Caprolactam, Glyoxal, and Glyoxylic Acid							
Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Electronics Industry	+	0.1	0.2	0.2	0.2	0.3	0.3
HFCs	39.0	116.4	160.8	160.9	165.4	168.2	175.1
Substitution of Ozone Depleting Substances ^a	0.3	99.4	156.1	157.7	161.9	166.1	172.4
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Electronics Industry	0.2	0.2	0.3	0.3	0.3	0.3	0.4
Magnesium Production and Processing	NO	NO	0.1	0.1	0.1	0.1	+
PFCs	21.8	6.1	3.8	4.3	4.0	3.9	3.5
Electronics Industry	2.5	3.0	2.7	2.8	2.5	2.4	2.6
Aluminum Production	19.3	3.1	1.0	1.4	1.4	1.4	0.9
Substitution of Ozone Depleting Substances	NO	+	+	+	+	+	+
Electrical Transmission and Distribution	NO	+	+	NO	+	+	+
SF ₆	30.5	15.5	7.2	7.1	7.8	7.5	8.0
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
Magnesium Production and Processing	5.4	2.9	1.0	1.1	0.9	0.9	1.1
Electronics Industry	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF ₃	+	0.4	0.5	0.5	0.5	0.6	0.6
Electronics Industry	+	0.4	0.5	0.5	0.5	0.6	0.6
Total	335.4	356.1	359.1	362.2	366.8	363.2	376.4

⁺ Does not exceed 0.05 MMT CO₂ Eq.

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

IPPU sector emissions increased 3.6 percent since 2020 and 12.2 percent since 1990. Some significant trends in U.S. emissions from IPPU source categories over the thirty-two-year period from 1990 through 2021 included the following:

- HFC and PFC emissions resulting from the substitution of ODS (e.g., chlorofluorocarbons [CFCs]) have been increasing from small amounts in 1990 to 172.5 MMT CO₂ Eq. in 2021 (68,134.2 percent).
- Combined CO₂ and CH₄ emissions from iron and steel production and metallurgical coke production decreased by 10.5 percent from 2020 to 2021 to 41.7 MMT CO₂ Eq. and have declined overall by 63.1 MMT CO₂ Eq. (60.2 percent) from 1990 through 2021, due to restructuring of the industry. The trend in the United States has been a shift towards fewer integrated steel mills and more electric arc furnaces (EAFs). EAFs use scrap steel as their main input and generally have less on-site emissions.
- Carbon dioxide emissions from petrochemical production increased by 53.3 percent between 1990 and 2021 from 21.6 MMT CO₂ Eq. to 33.2 MMT CO₂ Eq. The increase in emissions is largely driven by a doubling of production of ethylene over that time period.
- Carbon dioxide emissions from ammonia production (12.2 MMT CO₂ Eq. in 2021) decreased by 15.2 percent (2.2 MMT CO₂ Eq.) since 1990. Ammonia production relies on natural gas as both a feedstock and a fuel, and as such, market fluctuations and volatility in natural gas prices affect the production of ammonia from year to year. Emissions from ammonia production have increased since 2016, due to the addition of new ammonia production facilities and new production units at existing facilities. Agricultural demands continue to drive demand for nitrogen fertilizers and the need for new ammonia production capacity.
- Carbon dioxide emissions from cement production increased by 23.4 percent (7.8 MMT CO₂ Eq.) from 1990 through 2021. They rose from 1990 through 2006 and then fell until 2009, due to a decrease in

^a Small amounts of PFC emissions also result from this source.

demand for construction materials during the economic recession. Since 2010, CO₂ emissions from cement production have risen 31.4 percent (9.9 MMT CO₂ Eq.).

- HFC-23 emissions from HCFC-22 production decreased by 36.4 MMT CO₂ Eq. (94.2 percent) from 1990 to 2021 due to a reduction in the HFC-23 emission rate (kg HFC-23 emitted/kg HCFC-22 produced).
- PFC emissions from aluminum production decreased by 18.4 MMT CO₂ Eg. (95.3 percent) from 1990 to 2021, due to both industry emission reduction efforts and lower domestic aluminum production.
- SF₆ emissions from electrical transmission and distribution decreased by 18.7 MMT CO₂ Eq. (75.7 percent) from 1990 to 2021 due to industry emission reduction efforts.

Agriculture

Agricultural activities contribute directly to emissions of greenhouse gases through a variety of processes, including the following source categories: enteric fermentation in domestic livestock, livestock manure management, rice cultivation, agricultural soil management, liming, urea fertilization, and field burning of agricultural residues. Methane, N₂O, and CO₂ are the primary greenhouse gases emitted by agricultural activities. Carbon stock changes from agricultural soils are included in the LULUCF sector.

In 2021, agricultural activities were responsible for emissions of 598.1 MMT CO₂ Eq., or 9.4 percent of total U.S. greenhouse gas emissions. Agricultural soil management activities, such as the application of synthetic and organic fertilizers, deposition of livestock manure, and growing N-fixing plants, were the largest contributors to agricultural-related emissions (49.2 percent) and were the largest source of U.S. N₂O emissions in 2021, accounting for 74.8 percent. Methane emissions from enteric fermentation and manure management represented 26.8 percent and 9.1 percent of total CH₄ emissions from anthropogenic activities, respectively, in 2021. Carbon dioxide emissions from the application of crushed limestone and dolomite (i.e., soil liming) and urea fertilization represented 0.2 percent of total CO₂ emissions from anthropogenic activities. Figure 2-10 and Table 2-7 illustrate agricultural greenhouse gas emissions by source and gas.

Figure 2-10: Trends in Agriculture Sector Greenhouse Gas Sources

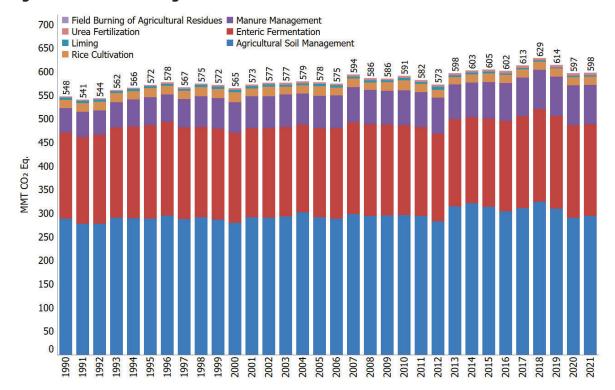


Table 2-7: Emissions from Agriculture (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	7.1	7.9	7.9	7.2	7.2	8.0	8.3
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
CH ₄	240.4	263.7	277.5	281.2	280.4	281.0	278.2
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Manure Management	39.0	54.9	64.4	66.5	65.7	66.7	66.0
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Field Burning of Agricultural							
Residues	0.4	0.5	0.5	0.5	0.5	0.5	0.5
N ₂ O	300.5	306.1	327.7	341.1	326.9	308.2	311.6
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Manure Management	12.4	14.5	16.9	17.2	17.4	17.5	17.4
Field Burning of Agricultural							
Residues	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Total	548.0	577.7	613.1	629.5	614.5	597.3	598.1

Note: Totals may not sum due to independent rounding.

Agriculture sector emissions increased 0.1 percent since 2020 and 9.1 percent since 1990. Some significant trends in U.S. emissions from Agriculture source categories (Figure 2-10) over the thirty-two-year from 1990 through 2021 included the following:

- Agricultural soils are the largest anthropogenic source of agriculture-related emissions and also N₂O emissions in the United States, accounting for 74.8 percent of N₂O emissions and 4.6 percent of total emissions in the United States in 2021. Estimated emissions from this source in 2021 were 294.0 MMT CO₂ Eq. Annual N₂O emissions from agricultural soils fluctuated between 1990 and 2021, and overall emissions were 6.1 MMT CO₂ Eq. or 2.1 percent higher in 2021 than in 1990. Year-to-year fluctuations are largely a reflection of annual variation in weather patterns, synthetic fertilizer use, and crop production.
- Enteric fermentation is the largest anthropogenic source of CH₄ emissions in the United States. In 2021, enteric fermentation CH₄ emissions were 26.8 percent of total CH₄ emissions (194.9 MMT CO₂ Eq.), which represents an increase of 11.9 MMT CO₂ Eq. (6.5 percent) since 1990. This increase in emissions from enteric fermentation from 1990 to 2021 generally follows the increasing trends in cattle populations. For example, from 1990 to 1995, emissions increased and then generally decreased from 1996 to 2004, mainly due to fluctuations in beef cattle populations and increased digestibility of feed for feedlot cattle. Emissions increased from 2005 to 2007, as both dairy and beef populations increased. Research indicates that the feed digestibility of dairy cow diets decreased during this period. Emissions decreased again from 2008 to 2014 as beef cattle populations again decreased. Emissions increased from 2014 to 2021, consistent with an increase in beef cattle population over those same years.
- Manure management emissions increased 62.3 percent between 1990 and 2021. This encompassed an increase of 69.2 percent for CH₄, from 39.0 MMT CO₂ Eq. in 1990 to 66.0 MMT CO₂ Eq. in 2021; and an increase of 40.5 percent for N₂O, from 12.4 MMT CO₂ Eq. in 1990 to 17.4 MMT CO₂ Eq. in 2021. The majority of the increase observed in CH₄ resulted from swine and dairy cattle manure, where emissions increased 38.3 and 124.3 percent, respectively, from 1990 to 2021. From 2020 to 2021, there was a 1.1 percent decrease in total CH₄ emissions from manure management, mainly due to minor shifts in the animal populations and the resultant effects on manure management system allocations.
- Liming and urea fertilization are the only sources of CO₂ emissions reported in the Agriculture sector. All other CO₂ emissions and removals (e.g., carbon stock changes from the management of croplands, etc.) are characterized in the LULUCF sector. Estimated emissions from these sources were 3.0 and 5.2 MMT CO₂ Eq., respectively. Liming emissions increased by 4.5 percent relative to 2020 and decreased 1.6 MMT CO₂ Eq. or 35.0 percent relative to 1990, while urea fertilization emissions increased by 1.8 percent relative to 2020 and 2.8 MMT CO₂ Eq. or 115.7 percent relative to 1990.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 152 of 1050 PageID 3600

Land Use, Land-Use Change, and Forestry

When humans alter the terrestrial biosphere through land use, changes in land use, and land management practices, they also influence the carbon (C) stock fluxes on these lands and cause emissions of CH_4 and N_2O . Overall, managed land is a net sink for CO_2 (C sequestration) in the United States. The primary driver of fluxes on managed lands is from management of forest lands, but also includes trees in settlements (i.e., urban areas), afforestation, conversion of forest lands to settlements and croplands, the management of croplands and grasslands, flooded lands, and the landfilling of yard trimmings and food scraps. The main drivers for net forest sequestration include net forest growth, increasing forest area, and a net accumulation of C stocks in harvested wood pools. The net sequestration in Settlements Remaining Settlements, is driven primarily by C stock gains in urban forests (i.e., Settlement Trees) through net tree growth and increased urban area, as well as long-term accumulation of C in landfills from additions of yard trimmings and food scraps.

The LULUCF sector in 2021 resulted in a net increase in C stocks (i.e., net CO_2 removals) of 832.0 MMT CO_2 Eq. (Table 2-8). This represents an offset of 13.1 percent of total (i.e., gross) greenhouse gas emissions in 2021. Emissions of CH_4 and N_2O from LULUCF activities in 2021 were 77.8 MMT CO_2 Eq. and represented 1.4 percent of net greenhouse gas emissions. Between 1990 and 2021, total net C sequestration in the LULUCF sector decreased by 11.4 percent, primarily due to a decrease in the rate of net C accumulation in forests and Cropland Remaining Cropland, as well as an increase in CO_2 emissions from Land Converted to Settlements.

Flooded Land Remaining Flooded Land was the largest source of CH₄ emissions from LULUCF in 2021, totaling 45.4 MMT CO₂ Eq. (1,623 kt of CH₄). Forest fires were the second largest source of CH₄ emissions from LULUCF in 2021, totaling 15.5 MMT CO₂ Eq. (554 kt of CH₄). Coastal Wetlands Remaining Coastal Wetlands resulted in CH₄ emissions of 4.3 MMT CO₂ Eq. (154 kt of CH₄). Grassland fires resulted in CH₄ emissions of 0.3 MMT CO₂ Eq. (12 kt of CH₄). Land Converted to Wetlands, drained organic soils, and Peatlands Remaining Peatlands resulted in CH₄ emissions of less than 0.05 MMT CO₂ Eq. each.

Forest fires were the largest source of N_2O emissions from LULUCF in 2021, totaling 8.9 MMT CO_2 Eq. (34 kt of N_2O). Nitrous oxide emissions from fertilizer application to settlement soils in 2021 totaled to 2.1 MMT CO_2 Eq. (8 kt of N_2O). Additionally, the application of synthetic fertilizers to forest soils in 2021 resulted in N_2O emissions of 0.4 MMT CO_2 Eq. (2 kt of N_2O). Grassland fires resulted in N_2O emissions of 0.3 MMT CO_2 Eq. (1 kt of N_2O). Coastal Wetlands Remaining Coastal Wetlands and drained organic soils resulted in N_2O emissions of 0.1 MMT CO_2 Eq. (0.5 kt of N_2O) and 0.1 MMT CO_2 Eq. (0.2 kt N_2O) respectively. Peatlands Remaining Peatlands resulted in N_2O emissions of less than 0.05 MMT CO_2 Eq. Figure 2-11 and Table 2-8 along with CO_2 Eq. (0.5 purple) for LULUCF source categories.

-

³ LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

 $^{^4}$ LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Flooded Land Remaining Flooded Land, Land Converted to Flooded Land, and Land Converted to Coastal Wetlands; and N₂O emissions from forest soils and settlement soils.

Figure 2-11: Trends in Emissions and Removals (Net CO₂ Flux) from Land Use, Land-Use Change, and Forestry

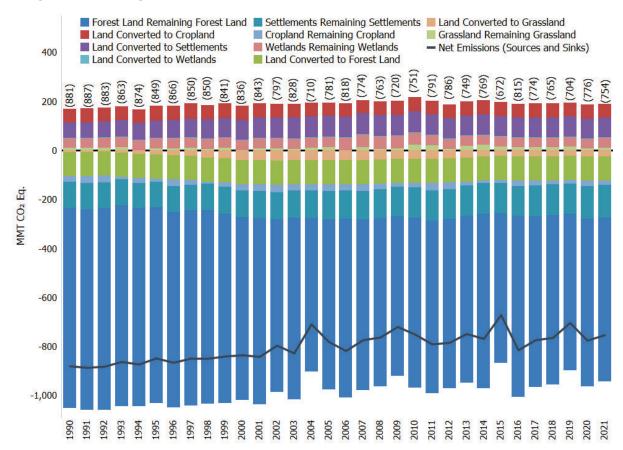


Table 2-8: U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO₂ Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Forest Land Remaining Forest Land	(815.8)	(695.4)	(695.2)	(692.9)	(638.1)	(684.0)	(670.5)
Changes in Forest Carbon Stocks ^a	(821.4)	(714.2)	(710.7)	(704.4)	(649.3)	(707.4)	(695.4)
Non-CO ₂ Emissions from Forest Fires ^b	5.5	18.3	15.0	11.0	10.8	23.0	24.4
N ₂ O Emissions from Forest Soils ^c	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Non-CO ₂ Emissions from Drained Organic							
Soils ^d	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Land Converted to Forest Land	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Changes in Forest Carbon Stockse	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Changes in Mineral and Organic Soil							
Carbon Stocks	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Changes in all Ecosystem Carbon Stocksf	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grassland	8.8	11.7	11.6	11.9	14.6	6.7	10.6
Changes in Mineral and Organic Soil							
Carbon Stocks	8.7	11.0	10.9	11.3	14.0	6.0	10.0
Non-CO ₂ Emissions from Grassland Fires ^g	0.2	0.7	0.6	0.6	0.6	0.6	0.6
Land Converted to Grassland	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Changes in all Ecosystem Carbon Stocks ^f	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlands	41.5	43.1	41.8	41.8	41.8	41.8	41.8

Changes in Organic Soil Carbon Stocks in							
Peatlands	1.1	1.1	0.8	0.8	0.8	0.7	0.7
Non-CO ₂ Emissions from Peatlands							
Remaining Peatlands	+	+	+	+	+	+	+
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Coastal Wetlands	(8.4)	(7.7)	(8.8)	(8.8)	(8.8)	(8.8)	(8.8)
CH ₄ Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	4.2	4.2	4.3	4.3	4.3	4.3	4.3
N ₂ O Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	0.1	0.2	0.1	0.1	0.1	0.1	0.1
CH ₄ Emissions from Flooded Land							
Remaining Flooded Land	44.6	45.3	45.4	45.4	45.4	45.4	45.4
Land Converted to Wetlands	3.3	1.4	0.8	0.8	0.8	0.6	0.6
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Land Converted to							
Coastal Wetlands	0.5	0.5	(+)	(+)	(+)	(+)	(+)
CH ₄ Emissions from Land Converted to							
Coastal Wetlands	0.3	0.3	0.2	0.2	0.2	0.2	0.2
Changes in Land Converted to Flooded							
Land	1.4	0.4	0.4	0.4	0.4	0.3	0.3
CH₄ Emissions from Land Converted to							
Flooded Land	1.1	0.3	0.3	0.3	0.3	0.2	0.2
Settlements Remaining Settlements	(107.8)	(113.9)	(125.6)	(125.0)	(124.5)	(131.6)	(132.5)
Changes in Organic Soil Carbon Stocks	11.3	12.2	16.0	15.9	15.9	15.9	15.9
Changes in Settlement Tree Carbon							
Stocks	(96.4)	(117.4)	(129.6)	(129.5)	(129.3)	(136.7)	(137.8)
N ₂ O Emissions from Settlement Soils ^h	1.8	2.8	1.9	2.0	2.0	2.0	2.1
Changes in Yard Trimming and Food							
Scrap Carbon Stocks in Landfills	(24.5)	(11.4)	(13.8)	(13.4)	(13.1)	(12.8)	(12.6)
Land Converted to Settlements	62.5	85.0	80.9	81.0	81.1	81.0	81.0
Changes in all Ecosystem Carbon Stocks ^f	62.5	85.0	80.9	81.0	81.1	81.0	81.0
LULUCF Emissions ⁱ	57.9	72.4	68.3	64.4	64.2	76.4	77.8
CH ₄	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N ₂ O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Change ^j	(938.9)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
LULUCF Sector Net Totalk	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)

⁺ Absolute value does not exceed 0.05 MMT CO_2 Eq.

^a Includes the net changes to carbon stocks stored in all forest ecosystem pools (estimates include C stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land.) and harvested wood products.

^b Estimates include emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

^c Estimates include emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

 $^{^{}m d}$ Estimates include CH $_{
m 4}$ and N $_{
m 2}$ O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land. Carbon stock changes from drained organic soils are included with the Forest Land Remaining Forest Land forest ecosystem pools.

^e Includes the net changes to carbon stocks stored in all forest ecosystem pools.

f Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements.

g Estimates include CH₄ and N₂O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

^h Estimates include N₂O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.

ⁱ LULUCF emissions subtotal includes the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land, and Land Converted to Coastal Wetlands; and N₂O emissions from forest soils and settlement soils. Emissions values are included in land-use category rows.

¹ LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land-use conversion categories.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Overall CH $_4$ and N $_2$ O emissions from LULUCF increased 1.9 percent from 2020 and 34.4 percent since 1990 while total net sequestration decreased 11.4 percent since 1990 and 2.4 percent from 2020. Other significant trends from 1990 to 2021 in emissions from LULUCF categories (Figure 2-11) over the thirty-two-year period included the following:

- Annual carbon (C) sequestration by forest land (i.e., annual C stock accumulation in the five ecosystem C pools and harvested wood products for Forest Land Remaining Forest Land and Land Converted to Forest Land) has decreased by 13.7 percent since 1990. This is primarily due to decreased C stock gains in Land Converted to Forest Land and the harvested wood products pools within Forest Land Remaining Forest Land.
- Annual C sequestration from Settlements Remaining Settlements (which includes organic soils, settlement
 trees, and landfilled yard trimmings and food scraps) has increased by 22.8 percent over the period from
 1990 to 2021. This is primarily due to an increase in urbanized land area in the United States with trees
 growing on it.
- Annual emissions from Land Converted to Settlements increased by 29.7 percent from 1990 to 2021 due
 primarily to C stock losses from Forest Land Converted to Settlements and mineral soils C stocks from
 Grassland Converted to Settlements.

Waste

Waste management and treatment activities are sources of CH₄ and N₂O emissions (see Figure 2-12 and Table 2-9). In 2021, landfills were the largest source of waste emissions, accounting for 72.5 percent of waste-related emissions. Landfills are also the third-largest source of U.S. anthropogenic CH₄ emissions, generating 122.6 MMT CO₂ Eq. and accounting for 16.9 percent of total U.S. CH₄ emissions in 2021. Additionally, wastewater treatment generated emissions of 42.0 MMT CO₂ Eq. and accounted for 24.8 percent of waste emissions, 2.9 percent of U.S. CH₄ emissions, and 5.3 percent of U.S. N₂O emissions in 2021. Emissions of CH₄ and N₂O from composting are also accounted for in this chapter, generating emissions of 2.6 MMT CO₂ Eq. and 1.8 MMT CO₂ Eq., respectively. Anaerobic digestion at biogas facilities generated CH₄ emissions of 0.2 MMT CO₂ Eq., accounting for 0.1 percent of emissions from the Waste sector. Overall, emission sources accounted for in the Waste chapter generated 169.2 MMT CO₂ Eq., or 2.7 percent of total U.S. greenhouse gas emissions in 2021.

2-26 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

^k The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO₂ Eq.

⁵ Landfills also store carbon, due to incomplete degradation of organic materials such as wood products and yard trimmings, as described in the Land Use, Land-Use Change, and Forestry chapter.

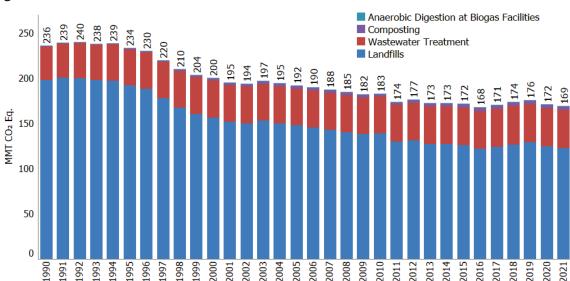


Figure 2-12: Trends in Waste Sector Greenhouse Gas Sources

Table 2-9: Emissions from Waste (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CH ₄	220.9	172.5	148.3	150.8	152.9	148.8	146.4
Landfills	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Wastewater Treatment	22.7	22.7	21.5	21.4	21.2	21.3	21.1
Composting	0.4	2.1	2.7	2.5	2.5	2.6	2.6
Anaerobic Digestion at							
Biogas Facilities	+	+	0.2	0.2	0.2	0.2	0.2
N₂O	15.1	19.5	22.6	22.9	23.1	22.7	22.7
Wastewater Treatment	14.8	18.1	20.6	21.2	21.3	20.9	20.9
Composting	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Total	236.0	192.1	170.9	173.7	176.0	171.5	169.2

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Waste sector emissions decreased 1.4 percent since 2020 and 28.3 percent since 1990. Some significant trends in U.S. emissions from waste source categories (Figure 2-12) over the thirty-two-year period from 1990 through 2021 included the following:

- Net CH₄ emissions from landfills decreased by 75.1 MMT CO₂ Eq. (38.0 percent), with small increases occurring in interim years. This downward trend in emissions coincided with increased landfill gas collection and control systems, and a reduction of decomposable materials (i.e., paper and paperboard, food scraps, and yard trimmings) discarded in municipal solid waste (MSW) landfills over the time series.
- Methane and N₂O emissions from wastewater treatment decreased by 1.6 MMT CO₂ Eq. (7.2 percent) and increased by 6.1 MMT CO₂ Eq. (41.6 percent), respectively. Methane emissions from domestic wastewater treatment have decreased since 1999 due to decreasing percentages of wastewater being treated in anaerobic systems, including reduced use of on-site septic systems and central anaerobic treatment systems. Nitrous oxide emissions from wastewater treatment processes gradually increased across the time series as a result of increasing U.S. population and protein consumption.
- Combined CH₄ and N₂O emissions from composting have increased by 3.7 MMT CO₂ Eq. since 1990, from 0.7 MMT CO₂ Eq. to 4.4 MMT CO₂ Eq. in 2021, which represents more than a six-fold increase over the time series. The growth in composting since the 1990s is attributable to primarily four factors: (1) the enactment of legislation by state and local governments that discouraged the disposal of yard trimmings

and food waste in landfills; (2) an increase in yard trimming collection and yard trimming drop off sites provided by local solid waste management districts; (3) an increased awareness of the environmental benefits of composting; and (4) loans or grant programs to establish or expand composting infrastructure.

Emissions by Economic Sector 2.2

Throughout this report, emission estimates are grouped into five sectors (i.e., chapters) defined by the IPCC and detailed above: Energy, IPPU, Agriculture, LULUCF, and Waste. It is also useful to characterize emissions according to commonly used economic sector categories: residential, commercial, industry, transportation, electric power, and agriculture. Emissions from U.S. Territories are reported as their own end-use sector due to a lack of specific consumption data for the individual end-use sectors within U.S. Territories. See Box 2-1 for more information on how economic sectors are defined. For more information on trends in the LULUCF sector, see Section 2.1.

Using this categorization, transportation activities accounted for the largest portion (28.5 percent) of total U.S. greenhouse gas emissions in 2021. Emissions from electric power accounted for the second largest portion (25.0 percent), while emissions from industry accounted for the third largest portion (23.5 percent) of total U.S. greenhouse gas emissions in 2021. Emissions from industry have in general declined over the past decade due to a number of factors, including structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and efficiency improvements.

The remaining 23.1 percent of U.S. greenhouse gas emissions were contributed by, in order of magnitude, the agriculture, commercial, and residential sectors, plus emissions from U.S. Territories. Activities related to agriculture accounted for roughly 10.0 percent of emissions; unlike other economic sectors, agricultural sector emissions were dominated by N₂O emissions from agricultural soil management and CH₄ emissions from enteric fermentation, rather than CO₂ from fossil fuel combustion. An increasing amount of carbon is stored in agricultural soils each year, but this C sequestration is assigned to the LULUCF sector rather than the agriculture economic sector. The commercial and residential sectors accounted for roughly 6.9 percent and 5.8 percent of greenhouse gas emissions, respectively, and U.S. Territories accounted for 0.4 percent of emissions; emissions from these sectors primarily consisted of CO₂ emissions from fossil fuel combustion. Carbon dioxide was also emitted and sequestered (in the form of C) by a variety of activities related to forest management practices, tree planting in urban areas, the management of agricultural soils, landfilling of yard trimmings, and changes in C stocks in coastal wetlands. Table 2-10 presents a detailed breakdown of emissions from each of these economic sectors by source category, as they are defined in this report. Figure 2-13 shows the trend in emissions by sector from 1990 to 2021.

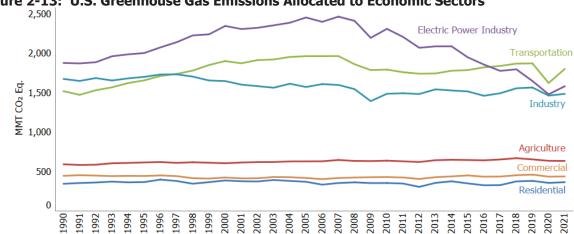


Figure 2-13: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors

Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

Table 2-10: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors (MMT CO_2 Eq. and Percent of Total in 2021)

Sector/Source	1990	2005	2017	2018	2019	2020	2021	Percenta
Transportation	1,521.4	1,966.0	1,841.6	1,871.3	1,874.3	1,624.9	1,804.3	28.5%
CO ₂ from Fossil Fuel Combustion	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4	27.6%
Substitution of Ozone Depleting								
Substances	+	63.1	37.0	35.5	34.0	32.5	31.2	0.5%
Mobile Combustion ^b	40.6	34.2	14.9	13.6	15.0	12.1	12.7	0.2%
Non-Energy Use of Fuels	11.8	10.2	9.6	9.2	8.8	7.8	8.0	0.1%
Electric Power Industry	1,879.7	2,456.9	1,779.2	1,799.1	1,650.5	1,481.8	1,584.1	25.0%
CO ₂ from Fossil Fuel Combustion	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9	24.3%
Stationary Combustion ^b	18.7	27.7	23.2	23.1	20.2	18.9	20.4	0.3%
Incineration of Waste	13.3	13.6	13.5	13.7	13.3	13.3	12.8	0.2%
Electrical Transmission and								
Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0	0.1%
Other Process Uses of Carbonates	3.1	3.7	4.9	3.7	4.2	4.2	4.0	0.1%
Industry	1,677.3	1,574.4	1,494.5	1,558.0	1,568.2	1,465.4	1,487.3	23.5%
CO ₂ from Fossil Fuel Combustion	809.1	800.0	749.2	773.7	776.2	729.3	739.1	11.7%
Natural Gas Systems	247.3	228.3	218.1	227.1	232.2	221.8	217.5	3.4%
Non-Energy Use of Fuels	97.2	111.2	103.1	120.0	118.5	111.2	132.0	2.1%
Petroleum Systems	60.8	61.2	86.4	96.8	106.8	83.6	74.9	1.2%
Coal Mining	112.7	76.0	64.5	62.2	56.0	48.3	47.1	0.7%
Iron and Steel Production	104.8	70.1	40.8	42.9	43.1	37.7	41.7	0.7%
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3	0.7%
Petrochemical Production	21.9	27.5	29.2	29.7	31.1	30.1	33.6	0.5%
Substitution of Ozone Depleting								
Substances	+	7.9	30.2	32.1	33.3	34.1	32.4	0.5%
Landfills (Industrial)	12.2	16.1	18.4	18.5	18.6	18.8	18.9	0.3%
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2	0.2%
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9	0.2%
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.3	8.3	0.1%
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9	0.1%
Wastewater Treatment	6.6	7.1	7.4	7.5	7.6	7.6	7.6	0.1%
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6	0.1%
Abandoned Underground Coal			-				-	
Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4	0.1%
Mobile Combustion ^b	3.6	5.6	5.4	5.5	5.6	5.4	5.5	0.1%
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0	0.1%
Urea Consumption for Non-	2.0					0.0	0.0	0.275
Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0	0.1%
Electronics Industry	3.3	4.5	4.6	4.7	4.3	4.4	4.8	0.1%
Other Process Uses of Carbonates	3.1	3.7	4.9	3.7	4.2	4.2	4.0	0.1%
N₂O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8	0.1%
Stationary Combustion ^b	4.7	4.5	3.9	3.9	3.8	3.6	3.6	+%
Aluminum Production	26.1	7.2	2.2	2.9	3.3	3.2	2.5	0.1%
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2	+%
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0	+%
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7	+%
Ferroalloy Production	2.2	1.7	2.0	2.1	1.6	1.4	1.6	+%
Titanium Dioxide Production								
Caprolactam, Glyoxal, and	1.2	1.8	1.7	1.5	1.5	1.2	1.5	+%
Glyoxylic Acid Production	4 5	1.0	1 2	1 2	1 2	1.2	1.2	.0/
Magnesium Production and	1.5	1.9	1.3	1.3	1.2	1.2	1.2	+%
_		2.0	1 1	1 1	1.0	0.0	1.2	.0/
Processing	5.5	2.9	1.1	1.1	1.0	0.9	1.2	+%

Net Emissions (Sources and Sinks)	5,606.4	6,696	.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0	88.1%
LULUCF Sector Net Total ^c	881.0)	(781		(774.2)	(765.1)	(704.0)	(776.2)	(754.2)	(11.9%)
Total Gross Emissions (Sources)	6,487.3	7,477		6,561.8	6,754.8	6,617.9	6,026.0	6,340.2	100.0%
Stationary Combustion ^b	0.1		.2	0.1	0.1	0.1	0.1	0.1	+%
Non-Energy Use of Fuels	3.4		.6	0.2	0.2	0.2	0.2	0.2	+%
CO ₂ from Fossil Fuel Combustion	20.0		.9	25.9	25.9	24.8	23.3	23.8	0.4%
U.S. Territories	23.4	59		26.3	26.3	25.1	23.6	24.1	0.4%
Stationary Combustion ^b	6.8		.3	4.9	5.9	6.2	5.1	5.3	0.1%
Substances	0.2		.0	30.0	31.7	34.8	38.7	46.9	0.7%
Substitution of Ozone Depleting									
CO ₂ from Fossil Fuel Combustion	338.6	358	.9	293.4	338.2	341.4	313.2	313.3	4.9%
Residential	345.6	371		328.4	375.8	382.4	356.9	365.6	5.8%
Facilities	+		+	0.2	0.2	0.2	0.2	0.2	+%
Anaerobic Digestion at Biogas									
Stationary Combustion ^b	1.5	1	.5	1.6	1.7	1.7	1.6	1.6	+%
Composting	0.7		.6	4.7	4.3	4.3	4.4	4.4	0.1%
Wastewater Treatment	30.9	33		34.7	35.0	34.8	34.6	34.3	0.5%
Substances	+		.4	58.9	58.5	59.8	60.8	61.9	1.0%
Substitution of Ozone Depleting									
Landfills (Municipal)	185.5	133	.6	105.5	108.2	110.4	106.0	103.7	1.6%
CO ₂ from Fossil Fuel Combustion	228.3	227		232.0	245.8	250.7	228.5	233.0	3.7%
Commercial	447.0	418	.9	437.6	453.7	462.0	436.0	439.2	6.9%
Stationary Combustion ^b	0.1		+	0.1	0.1	0.1	0.1	0.1	+%
Residues	0.6	(.7	0.7	0.6	0.6	0.6	0.6	+%
Field Burning of Agricultural									
Mobile Combustion ^b	1.4		.6	1.2	1.2	1.2	1.2	1.1	+%
Liming	4.7	4	.4	3.1	2.2	2.2	2.9	3.0	+%
Urea Fertilization	2.4	•	.5	4.9	4.9	5.0	5.1	5.2	0.1%
Rice Cultivation	17.9	20	.2	16.7	17.4	16.9	17.6	16.8	0.3%
CO ₂ from Fossil Fuel Combustion	43.4	50	.8	39.8	39.8	39.7	38.6	36.5	0.6%
Manure Management	51.4	69		81.3	83.7	83.1	84.2	83.4	1.3%
Enteric Fermentation	183.1	188	.2	195.9	196.8	197.3	196.2	194.9	3.1%
Management	288.0	293	.5	310.6	323.8	309.3	290.5	294.0	4.6%
N₂O from Agricultural Soil									
Agriculture	592.9	630	.2	654.2	670.6	655.4	637.2	635.8	10.0%
Consumption	0.3	(.2	0.2	0.2	0.2	0.2	0.2	+%
Carbide Production and									
Lead Production	0.5	(.6	0.5	0.5	0.5	0.5	0.4	+%
Phosphoric Acid Production	1.5	1	.3	1.0	0.9	0.9	0.9	0.9	+%
Zinc Production	0.6	1	.0	0.9	1.0	1.0	1.0	1.0	+%

⁺ Does not exceed 0.05 MMT CO_2 Eq. or 0.05 percent.

Notes: Total gross emissions presented are without LULUCF. Total net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Box 2-1: Methodology for Aggregating Emissions by Economic Sector

In presenting the Economic Sectors in the annual *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, the Inventory expands upon the standard IPCC sectors common for UNFCCC reporting. Discussing greenhouse gas emissions relevant to U.S.-specific economic sectors improves communication of the report's findings.

^a Percent of total (gross) emissions excluding emissions from LULUCF for 2021.

^b Includes CH₄ and N₂O emissions from fuel combustion.

 $^{^{}c}$ The LULUCF Sector Net Total is the net sum of all LULUCF CH $_{4}$ and $N_{2}O$ emissions to the atmosphere plus LULUCF net carbon stock changes.

The Electric Power economic sector includes CO_2 , CH_4 and N_2O emissions from the combustion of fossil fuels that are included in the EIA electric power sector. Carbon dioxide, CH_4 , and N_2O emissions from waste incineration are included in the Electric Power economic sector, as the majority of municipal solid waste is combusted in plants that produce electricity. The Electric Power economic sector also includes SF_6 from Electrical Transmission and Distribution, and a portion of CO_2 from Other Process Uses of Carbonates (from pollution control equipment installed in electric power plants).

The Transportation economic sector includes CO₂ emissions from the combustion of fossil fuels that are included in the EIA transportation fuel-consuming sector. (Additional analyses and refinement of the EIA data are further explained in the Energy chapter of this report.) Emissions of CH₄ and N₂O from mobile combustion are also apportioned to the Transportation economic sector based on the EIA transportation fuel-consuming sector. Substitution of Ozone Depleting Substances emissions are apportioned to the Transportation economic sector based on emissions from refrigerated transport and motor vehicle air-conditioning systems. Finally, CO₂ emissions from Non-Energy Uses of Fossil Fuels identified as lubricants for transportation vehicles are included in the Transportation economic sector.

The Industry economic sector includes CO_2 emissions from the combustion of fossil fuels that are included in the EIA industrial fuel-consuming sector, minus the agricultural use of fuel explained below. The CH_4 and N_2O emissions from stationary and mobile combustion are also apportioned to the Industry economic sector based on the EIA industrial fuel-consuming sector, minus emissions apportioned to the Agriculture economic sector. Substitution of Ozone Depleting Substances emissions are apportioned based on their specific end-uses within the source category, with most emissions falling within the Industry economic sector. Finally, CH_4 emissions from industrial landfills and CH_4 and N_2O from industrial wastewater treatment are included in the Industry economic sector.

Additionally, all process-related emissions from sources with methods considered within the IPCC IPPU sector are apportioned to the Industry economic sector. This includes the process-related emissions (i.e., emissions from the actual process to make the material, not from fuels to power the plant) from activities such as Cement Production, Iron and Steel Production and Metallurgical Coke Production, and Ammonia Production. Additionally, fugitive emissions from energy production sources, such as Natural Gas Systems, Coal Mining, and Petroleum Systems are included in the Industry economic sector. A portion of CO₂ from Other Process Uses of Carbonates (from pollution control equipment installed in large industrial facilities) is also included in the Industry economic sector. Finally, all remaining CO₂ emissions from Non-Energy Uses of Fossil Fuels are assumed to be industrial in nature (besides the lubricants for transportation vehicles specified above) and are attributed to the Industry economic sector.

The Agriculture economic sector includes CO₂ emissions from the combustion of fossil fuels that are based on supplementary sources of agriculture fuel use data, because EIA includes agriculture equipment in the industrial fuel-consuming sector. Agriculture fuel use estimates are obtained from U.S. Department of Agriculture survey data, in combination with EIA Fuel Oil and Kerosene Sales (FOKS) data (EIA 1991 through 2022). Agricultural operations are based on annual energy expense data from the Agricultural Resource Management Survey (ARMS) conducted by the National Agricultural Statistics Service (NASS) of the USDA. NASS collects information on farm production expenditures including expenditures on diesel fuel, gasoline, LP gas, natural gas, and electricity use on the farm with the annual ARMS. A USDA publication (USDA/NASS 2022) shows national totals, as well as select States and ARMS production regions. These supplementary data are subtracted from the industrial fuel use reported by EIA to obtain agriculture fuel use. Carbon dioxide emissions from fossil fuel combustion, and CH₄ and N₂O emissions from stationary and mobile combustion, are then apportioned to the Agriculture economic sector based on agricultural fuel use.

The other IPCC Agriculture emission source categories apportioned to the Agriculture economic sector include N_2O emissions from Agricultural Soils, CH_4 from Enteric Fermentation, CH_4 and N_2O from Manure Management, CH_4 from Rice Cultivation, CO_2 emissions from Liming and Urea Application, and CH_4 and N_2O from Field Burning of Agricultural Residues.

The Residential economic sector includes CO₂ emissions from the combustion of fossil fuels that are included in the EIA residential fuel-consuming sector. Stationary combustion emissions of CH₄ and N₂O are also based on

the EIA residential fuel-consuming sector. Substitution of Ozone Depleting Substances are apportioned to the Residential economic sector based on emissions from residential air-conditioning systems. Nitrous oxide emissions from the application of fertilizers to developed land (termed "settlements" by the IPCC) are also included in the Residential economic sector.

The Commercial economic sector includes CO₂ emissions from the combustion of fossil fuels that are included in the EIA commercial fuel-consuming sector. Emissions of CH₄ and N₂O from mobile combustion are also apportioned to the Commercial economic sector based on the EIA commercial fuel-consuming sector. Substitution of Ozone Depleting Substances emissions are apportioned to the Commercial economic sector based on emissions from commercial refrigeration/air-conditioning systems. Public works sources, including direct CH₄ from municipal landfills, CH₄ from anaerobic digestion at biogas facilities, CH₄ and N₂O from domestic wastewater treatment, and composting, are also included in the Commercial economic sector.

Emissions with Electricity Distributed to Economic Sectors

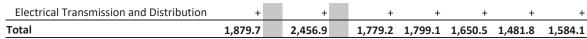
It is also useful to view greenhouse gas emissions from economic sectors with emissions related to electric power distributed into end-use categories (i.e., emissions from electric power are allocated to the economic sectors in which the electricity is used).

The generation, transmission, and distribution of electricity accounted for 25.0 percent of total U.S. greenhouse gas emissions in 2021. Electric power-related emissions decreased by 15.7 percent since 1990 mainly due to fuel switching in the electric power sector. From 2020 to 2021, electric power-related emissions increased by 6.9 percent due to in part to electricity use rebounding after the COVID-19 pandemic. Between 2020 to 2021, the consumption of natural gas for electric power generation decreased by 3.5 percent, while the consumption of coal and petroleum increased by 15.4 and 11.2 percent, respectively. However, even with the increase in 2021, electric power-related emissions are still lower than pre-pandemic 2019 levels.

From 2020 to 2021, electricity sales to the residential end-use sector increased by 0.4 percent. Electricity sales to the commercial end-use and industrial sectors increased by 3.2 percent and 4.3 percent, respectively. Overall, from 2020 to 2021, the amount of electricity retail sales (in kWh) increased by 2.4 percent. Table 2-11 provides a detailed summary of emissions from electric power-related activities.

Table 2-11: Electric Power-Related Greenhouse Gas Emissions (MMT CO₂ Eq.)

Gas/Fuel Type or Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	1,836.0	2,417.0	1,750.1	1,770.4	1,623.9	1,456.7	1,557.3
Fossil Fuel Combustion	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9
Coal	1,546.5	1,982.8	1,207.1	1,152.9	973.5	788.2	909.9
Natural Gas	175.4	318.9	505.6	577.9	616.6	634.8	612.9
Petroleum	97.5	98.0	18.9	22.2	16.2	16.2	17.7
Geothermal	0.5	0.5	0.4	0.4	0.4	0.4	0.4
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Other Process Uses of Carbonates	3.1	3.7	4.9	3.7	4.2	4.2	4.0
CH ₄	0.5	1.0	1.2	1.4	1.4	1.4	1.4
Stationary Sources ^a	0.5	1.0	1.2	1.4	1.4	1.4	1.4
Incineration of Waste	+	+	+	+	+	+	+
N_2O	18.6	27.1	22.4	22.1	19.1	17.9	19.4
Stationary Sources ^a	18.2	26.7	22.0	21.7	18.8	17.5	19.0
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
SF ₆	24.7	11.8	5.5	5.2	6.1	5.9	6.0
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
PFCs	+	+	+	+	+	+	+

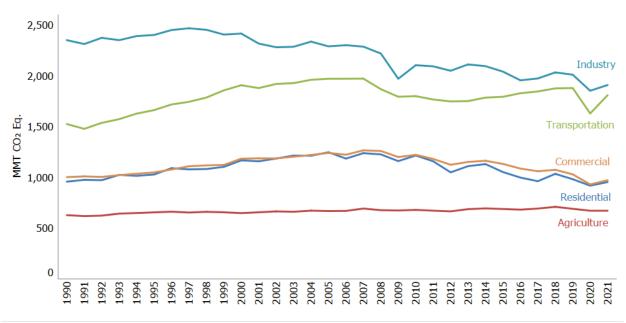


⁺ Does not exceed 0.05 MMT CO₂ Eq.

To distribute electricity emissions among economic end-use sectors, emissions from the source categories assigned to the electric power sector were allocated to the residential, commercial, industry, transportation, and agriculture economic sectors according to each economic sector's share of retail sales of electricity (EIA 2020b; USDA/NASS 2022). These source categories include CO_2 from fossil fuel combustion, CH_4 and N_2O from stationary combustion, incineration of waste, other process uses of carbonates, and SF_6 from electrical transmission and distribution systems. Note that only 50 percent of the other process uses of carbonates emissions were associated with electric power and distributed as described; the remainder of Other Process Uses of Carbonates emissions were attributed to the industry economic end-use sector. 6

When emissions from electricity use are distributed among these economic end-use sectors, emissions from industrial activities account for the largest share of total U.S. greenhouse gas emissions (30.1 percent), followed closely by emissions from transportation (28.5 percent). Emissions from the commercial and residential sectors also increase substantially when emissions from electricity are included (15.3 and 15.0 percent, respectively). In all economic end-use sectors except agriculture, CO₂ accounts for more than 77 percent of greenhouse gas emissions, primarily from the combustion of fossil fuels. Table 2-12 presents a detailed breakdown of emissions from each of these economic sectors, with emissions from electric power distributed to them. Figure 2-14 shows the trend in these emissions by sector from 1990 to 2021.

Figure 2-14: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed to Economic Sectors



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

Trends

2-33

^a Includes only stationary combustion emissions related to the generation of electricity. Note: Totals may not sum due to independent rounding.

⁶ Emissions were not distributed to U.S. Territories, since the electric power sector only includes emissions related to the generation of electricity in the 50 states and the District of Columbia.

Table 2-12: U.S. Greenhouse Gas Emissions by Economic Sector and Gas with Electricity-Related Emissions Distributed (MMT CO_2 Eq.) and Percent of Total in 2021

Sector/Gas	1990	2005	2017	2018	2019	2020	2021	Percenta
Industry	2,351.1	2,289.9	1,973.9	2,033.2	2,011.2	1,852.9	1,909.2	30.1%
Direct Emissions	1,677.3	1,574.4	1,494.5	1,558.0	1,568.2	1,465.4	1,487.3	23.5%
CO ₂	1,163.5	1,142.3	1,073.0	1,128.0	1,149.0	1,065.8	1,099.3	17.3%
CH ₄	411.6	367.3	353.3	357.9	350.3	329.5	319.8	5.0%
N_2O	35.6	29.8	27.3	30.3	26.0	27.7	26.8	0.4%
HFCs, PFCs, SF ₆ and NF ₃	66.5	35.0	40.9	41.8	42.9	42.3	41.3	0.7%
Electricity-Related	673.8	715.5	479.3	475.2	442.9	387.5	421.9	6.7%
CO ₂	658.1	703.8	471.5	467.7	435.8	380.9	414.8	6.5%
CH ₄	0.2	0.3	0.3	0.4	0.4	0.4	0.4	+%
N_2O	6.7	7.9	6.0	5.8	5.1	4.7	5.2	0.1%
SF ₆	8.8	3.4	1.5	1.4	1.6	1.5	1.6	+%
Transportation	1,524.6	1,970.9	1,846.0		1,879.2	1,629.2	1,809.5	28.5%
Direct Emissions	1,521.4	1,966.0	1,841.6		1,874.3	1,624.9	1,804.3	28.5%
CO ₂	1,480.8	1,868.7	1,789.7		1,825.2	1,580.3	1,760.4	27.8%
CH ₄	6.4	3.2	1.8	1.7	1.7	1.5	1.5	+%
N_2O	34.3	31.0	13.1	11.9	13.3	10.7	11.1	0.2%
HFCs ^b	+	63.1	37.0	35.5	34.0	32.5	31.2	0.5%
Electricity-Related	3.1	4.8	4.4	4.9	5.0	4.2	5.2	0.1%
CO ₂	3.1	4.8	4.4	4.8	4.9	4.2	5.1	0.1%
CH ₄	+	+	+	+	+	+	+	+%
N_2O	+	0.1	0.1	0.1	0.1	0.1	0.1	+%
SF ₆	+	+	+	+	+	+	+	+%
Residential	957.8	1,247.5	962.3	1,034.9	982.0	918.3	953.8	15.0%
Direct Emissions	345.6	371.2	328.4	375.8	382.4	356.9	365.6	5.8%
CO ₂	338.6	358.9	293.4	338.2	341.4	313.2	313.3	4.9%
CH ₄	5.9	4.5	4.2	5.1	5.3	4.4	4.6	0.1%
N_2O	0.9	0.8	0.7	0.8	0.8	0.7	0.7	+%
SF ₆	0.2	7.0	30.0	31.7	34.8	38.7	46.9	0.7%
Electricity-Related	612.2	876.3	633.9	659.0	599.6	561.3	588.3	9.3%
CO ₂	598.0	862.1	623.6	648.5	590.0	551.8	578.3	9.1%
CH ₄	0.2	0.3	0.4	0.5	0.5	0.5	0.5	+%
N ₂ O	6.1	9.7	8.0	8.1	6.9	6.8	7.2	0.1%
SF ₆	8.0	4.2	2.0	1.9	2.2	2.2	2.2	+%
Commercial	1,002.4	1,241.0	1,060.4		1,029.7	930.5	972.2	15.3%
Direct Emissions	447.0	418.9	437.6	453.7	462.0	436.0	439.2	6.9%
CO ₂	228.3	227.1	232.0	245.8	250.7	228.5	233.0	3.7%
CH ₄	203.7	150.9	124.3	126.6	128.5	124.2	121.7	1.9%
N ₂ O	15.1	19.4	22.4	22.8	23.0	22.5	22.6	0.4%
HFCs	+	21.4	58.9	58.5	59.8	60.8	61.9	1.0%
Electricity-Related	555.4	822.0	622.8	620.8	567.7	494.4	533.1	8.4%
CO ₂	542.5	808.7	612.6	610.9	558.6	486.1	524.1	8.3%
CH ₄	0.1	0.3	0.4	0.5	0.5	0.5	0.5	+%
N ₂ O	5.5	9.1	7.8	7.6	6.6	6.0	6.5	0.1%
SF ₆	7.3	4.0	1.9	1.8	2.1	2.0	2.0	+%
Agriculture	628.0	668.5	693.0	709.8	690.7	671.5	671.5	10.6%
Direct Emissions	592.9	630.2	654.2	670.6	655.4	637.2	635.8	10.0%
CO ₂	50.5	58.7	47.8	47.0	46.9	46.7	44.7	0.7%
CH ₄	240.6	263.9	277.7	281.4	280.6	281.2	278.4	4.4%
N ₂ O	301.7	307.6	328.8	342.2	328.0	309.3	312.6	4.9%
Electricity-Related	35.2	38.3	38.7	39.2	35.2	34.4	35.7	0.6%
CO ₂	34.3	37.7	38.1	38.5	34.6	33.8	35.1	0.6%
CH ₄	+	+	+	+	+	+	+	+%
N_2O	0.3	0.4	0.5	0.5	0.4	0.4	0.4	+%
SF ₆	0.5	0.2	0.1	0.1	0.1	0.1	0.1	+%
U.S. Territories	23.4	59.7	26.3	26.3	25.1	23.6	24.1	0.4%

Total Gross Emissions								
(Sources)	6,487.3	7,477.4	6,561.8	6,754.8	6,617.9	6,026.0	6,340.2	100.0%
LULUCF Sector Net Total ^c	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)	(11.9%)
Net Emissions (Sources and								
Sinks)	5,606.4	6,696.3	5,787.6	5,989.7	5,913.9	5,249.8	5,586.0	88.1%

⁺ Does not exceed 0.05 MMT CO₂ Eq. or 0.05 percent.

Notes: Total gross emissions are presented without LULUCF. Net emissions are presented with LULUCF. Emissions from electric power are allocated based on aggregate electricity use in each end-use sector. Totals may not sum due to independent rounding.

Industry

The Industry end-use sector includes CO_2 emissions from fossil fuel combustion from all manufacturing facilities, in aggregate, and with the distribution of electricity-related emissions, accounts for 30.1 percent of U.S. greenhouse gas emissions in 2021. This end-use sector also includes emissions that are produced as a byproduct of the non-energy-related industrial process activities. The variety of activities producing these non-energy-related emissions includes CH_4 emissions from petroleum and natural gas systems, fugitive CH_4 and CO_2 emissions from coal mining, byproduct CO_2 emissions from cement production, and HFC, PFC, SF_6 , and NF_3 byproduct emissions from the electronics industry, to name a few.

Since 1990, Industry sector emissions have declined by 18.8 percent. The decline has occurred both in direct emissions and indirect emissions associated with electricity use. Structural changes within the U.S. economy that led to shifts in industrial output away from energy-intensive manufacturing products to less energy-intensive products (e.g., shifts from producing steel to computer equipment) have had a significant effect on industrial emissions.

Transportation

When electricity-related emissions are distributed to economic end-use sectors, transportation activities accounted for 28.5 percent of U.S. greenhouse gas emissions in 2021. The largest sources of transportation greenhouse gas emissions in 2021 were light-duty trucks, which include sport utility vehicles, pickup trucks, and minivans (37.1 percent); medium- and heavy-duty trucks (23.1 percent); passenger cars (20.7 percent); commercial aircraft (6.6 percent); other aircraft (2.0 percent); pipelines (3.5 percent); ships and boats (2.8 percent); and rail (1.9 percent). These figures include direct CO₂, CH₄, and N₂O emissions from fossil fuel combustion used in transportation, indirect emissions from electricity use, and emissions from non-energy use (i.e., lubricants) used in transportation, as well as HFC emissions from mobile air conditioners and refrigerated transport allocated to these vehicle types.

From 1990 to 2021, total transportation emissions from fossil fuel combustion increased by approximately 19.4 percent. From 2020 to 2021, emissions increased by 11.5 percent, which followed a decline of 13.4 percent from 2019 to 2020 due to reduced travel demand during the COVID-19 pandemic. The increase in transportation emissions from 1990 to 2021 was due, in large part, to increased demand for travel. The number of VMT by light-duty motor vehicles (passenger cars and light-duty trucks) increased 45.1 percent from 1990 to 2021 as a result of a confluence of factors including population growth, economic growth, urban sprawl, and periods of low fuel prices.

The decline in new light-duty vehicle fuel economy between 1990 and 2004 reflected the increasing market share of light-duty trucks, which grew from approximately 29.6 percent of new vehicle sales in 1990 to 48.0 percent in 2004. Starting in 2005, average new vehicle fuel economy began to increase while light-duty VMT grew only modestly for much of the period. Light-duty VMT grew by less than one percent or declined each year between

^a Percent of total (gross) emissions excluding emissions from LULUCF for year 2021.

^b Includes primarily HFC-134a.

^c The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes.

2005 and 2013, then grew at a faster rate until 2016 (2.6 percent from 2014 to 2015, and 2.5 percent from 2015 to 2016). Since 2016, the rate of light-duty VMT growth has slowed to at or less than one percent each year. Average new vehicle fuel economy has increased almost every year since 2005, while light-duty truck market share decreased to 33.0 percent in 2009 and has since varied from year to year between 35.6 and 62.9 percent. Light-duty truck market share was about 62.9 percent of new vehicles in model year 2021 (EPA 2022b).

Table 2-13 provides a detailed summary of greenhouse gas emissions from transportation-related activities with electricity-related emissions included in the totals. Historically, the majority of electricity use in the transportation sector was for rail transport. However, more recently there has been increased electricity use in on-road electric and plug-in hybrid vehicles. For a more detailed breakout of emissions by fuel type by vehicle see Table A-92 in Annex 3.

Almost all of the energy used for transportation was supplied by petroleum-based products, with more than half being related to gasoline consumption in automobiles and other highway vehicles. Other fuel uses, especially diesel fuel for freight trucks and jet fuel for aircraft, accounted for the remainder. The primary driver of transportation-related emissions was CO₂ from fossil fuel combustion, which increased by 19.4 percent from 1990 to 2021 when including electricity distributed. This rise in CO₂ emissions, combined with an increase in HFCs from close to zero emissions in 1990 to 31.2 MMT CO₂ Eq. in 2021, led to an increase in overall greenhouse gas emissions from transportation activities of 18.7 percent.

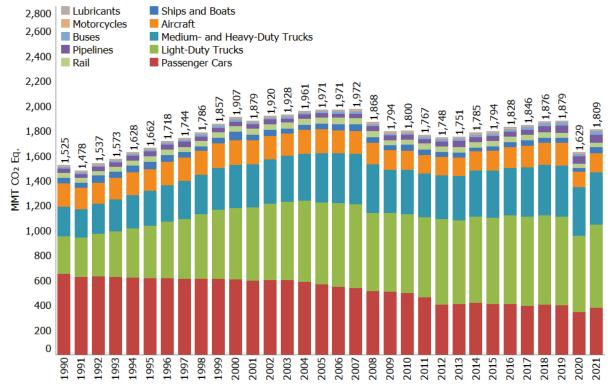


Figure 2-15: Trends in Transportation-Related Greenhouse Gas Emissions

Table 2-13: Transportation-Related Greenhouse Gas Emissions (MMT CO₂ Eq.)

Gas/Vehicle	1990	2	005	2017	2018	2019	2020	2021
Passenger Cars	648.4	5	64.4	392.7	398.7	395.5	341.7	374.2
CO ₂	622.2	5	21.1	379.0	386.5	384.2	331.9	365.0
CH ₄	3.8		1.2	0.3	0.3	0.3	0.3	0.3
N_2O	22.5		13.3	3.0	2.5	2.6	2.0	1.9
HFCs	0.0		28.8	10.4	9.4	8.4	7.6	7.0
Light-Duty Trucks	302.5	6	59.5	716.2	720.6	711.8	615.4	671.8

CO ₂	292.2	614.2	692.7	699.1	690.2	596.3	654.0
CH ₄	1.5	1.0	0.6	0.6	0.6	0.5	0.5
N ₂ O	8.7	14.0	5.4	4.6	5.6	4.4	4.2
HFCs	0.0	30.2	17.5	16.4	15.4	14.2	13.0
Medium- and Heavy-Duty Trucks	234.3	391.3	395.6	406.7	409.5	386.7	417.1
CO ₂	232.8	386.5	387.5	398.2	400.6	377.9	407.8
CH ₄	0.5	0.2	0.1	0.1	0.1	0.1	0.1
N ₂ O	1.0	1.5	2.6	2.7	3.0	2.7	3.0
HFCs	0.0	3.2	5.4	5.6	5.8	6.1	6.3
Buses	13.4	17.7	23.4	24.4	24.8	23.6	25.7
CO ₂	13.3	17.2	22.8	23.7	24.2	23.0	25.1
CH ₄	+	0.1	0.1	0.1	0.1	+	+
N ₂ O	+	0.1	0.2	0.2	0.2	0.2	0.2
HFCs	0.0	0.2	0.4	0.4	0.4	0.4	0.4
Motorcycles	3.4	5.0	7.2	7.4	7.5	6.7	7.5
CO ₂	3.4	4.9	7.0	7.3	7.4	6.6	7.4
CH ₄	+	+	+	+	+	+	+
N ₂ O	+	+	0.1	0.1	0.1	0.1	0.1
Commercial Aircraft ^a	110.8	133.8	129.0	130.7	137.8	92.0	120.0
CO ₂	109.9	132.7	128.0	129.6	136.7	91.3	119.0
CH ₄	0.0	0.0	0.0	0.0	0.0	0.0	0.0
N ₂ O	0.9	1.1	1.0	1.1	1.1	0.7	1.0
Other Aircraft ^b	78.0	59.5	45.5	44.6	45.6	31.0	35.5
CO ₂	77.3	59.0	45.1	44.2	45.2	30.7	35.1
CH ₄	0.1	0.1	+	+	+	+	+
N ₂ O	0.6	0.5	0.4	0.4	0.4	0.2	0.3
Ships and Boats ^c	47.0	45.5	43.8	41.1	40.0	32.4	50.2
CO ₂	46.3	44.3	39.9	36.9	35.5	27.6	45.0
CH ₄	0.4	0.5	0.5	0.5	0.4	0.4	0.5
N ₂ O	0.2	0.2	0.2	0.2	0.2	0.1	0.3
HFCs	0.0	0.5	3.2	3.6	3.9	4.2	4.5
Rail	39.0	51.4	41.3	42.5	39.7	34.0	35.2
CO ₂	38.5	50.8	40.7	41.9	39.1	33.5	34.7
CH ₄	0.1	0.1	0.1	0.1	0.1	0.1	0.1
N ₂ O	0.3	0.4	0.3	0.3	0.3	0.3	0.3
HFCs	0.0	0.1	0.1	0.1	0.1	0.1	0.1
Other Emissions from Electric							
Power ^d	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Pipelines ^e	36.0	32.6	41.6	50.2	58.2	57.9	64.2
CO ₂	36.0	32.6	41.6	50.2	58.2	57.9	64.2
Lubricants	11.8	10.2	9.6	9.2	8.8	7.8	8.0
CO ₂	11.8	10.2	9.6	9.2	8.8	7.8	8.0
Total Transportation	1,524.6	1,970.9	1,846.0	1,876.2	1,879.2	1,629.2	1,809.5
International Bunker Fuels ^f	54.7	44.6	34.5	32.4	26.2	22.7	22.7
Ethanol CO₂ ^g	4.1	21.6	77.7	78.6	78.7	68.1	75.4
Biodisel CO ₂ g	0.0	0.9	18.7	17.9	17.1	17.7	16.1

⁺ Does not exceed 0.05 MMT CO₂ Eq.

^a Consists of emissions from jet fuel consumed by domestic operations of commercial aircraft (no bunkers).

^b Consists of emissions from jet fuel and aviation gasoline consumption by general aviation and military aircraft.

^c Fluctuations in emission estimates are associated with fluctuations in reported fuel consumption and may reflect issues with data sources.

^d Other emissions from electric power are a result of waste incineration (as the majority of municipal solid waste is combusted in "trash-to-steam" electric power plants), electrical transmission and distribution, and a portion of Other Process Uses of Carbonates (from pollution control equipment installed in electric power plants).

- $^{\rm e}$ CO₂ estimates reflect natural gas used to power pipelines, but not electricity. While the operation of pipelines produces CH₄ and N₂O, these emissions are not directly attributed to pipelines in the Inventory.
- ^f Emissions from International Bunker Fuels include emissions from both civilian and military activities; these emissions are not included in the transportation totals.
- Ethanol and biodiesel CO₂ estimates are presented for informational purposes only. See Section 3.11 and the estimates in Land Use, Land-Use Change, and Forestry (see Chapter 6), in line with IPCC methodological guidance and UNFCCC reporting obligations, for more information on ethanol and biodiesel.
- Notes: Passenger cars and light-duty trucks include vehicles typically used for personal travel and less than 8,500 lbs; medium- and heavy-duty trucks include vehicles larger than 8,500 lbs. HFC emissions primarily reflect HFC-134a. Totals may not sum due to independent rounding.

Residential

The residential end-use sector, with electricity-related emissions distributed, accounts for 15.0 percent of U.S. greenhouse gas emissions in 2021 and similarly, is heavily reliant on electricity for meeting energy needs, with electricity use for lighting, heating, air conditioning, and operating appliances. The remaining emissions were largely due to the direct consumption of natural gas and petroleum products, primarily for heating and cooking needs. Emissions from the residential sector have generally been increasing since 1990, and annual variations are often correlated with short-term fluctuations in energy use caused by weather conditions, rather than prevailing economic conditions. In the long term, the residential sector is also affected by population growth, migration trends toward warmer areas, and changes in housing and building attributes (e.g., larger sizes and improved insulation). A shift toward energy-efficient products and more stringent energy efficiency standards for household equipment has also contributed to recent trends in energy demand in household.

Commercial

The commercial end-use sector, with electricity-related emissions distributed, accounts for 15.3 percent of U.S. greenhouse gas emissions in 2021 and is heavily reliant on electricity for meeting energy needs, with electricity use for lighting, heating, air conditioning, and operating appliances. The remaining emissions were largely due to the direct consumption of natural gas and petroleum products, primarily for heating and cooking needs. Energy-related emissions from the commercial sector have generally been increasing since 1990, and annual variations are often correlated with short-term fluctuations in energy use caused by weather conditions, rather than prevailing economic conditions. Decreases in energy-related emissions in the commercial sector in recent years can be largely attributed to an overall reduction in energy use driven by a reduction in heating degree days and increases in energy efficiency.

Municipal landfills and wastewater treatment are included in the commercial sector, with landfill emissions decreasing since 1990 and wastewater treatment emissions increasing slightly.

Agriculture

The agriculture end-use sector accounts for 10.6 percent of U.S. greenhouse gas emissions in 2021 when electricity-related emissions are distributed, and includes a variety of processes, including enteric fermentation in domestic livestock, livestock manure management, and agricultural soil management. In 2021, agricultural soil management was the largest source of N_2O emissions, and enteric fermentation was the largest source of CH_4 emissions in the United States. This sector also includes small amounts of CO_2 emissions from fossil fuel combustion by motorized farm equipment such as tractors.

Box 2-2: Trends in Various U.S. Greenhouse Gas Emissions-Related Data

Total (gross) greenhouse gas emissions can be compared to other economic and social indices to highlight changes over time. These comparisons include: (1) emissions per unit of aggregate energy use, because energy-related activities are the largest sources of emissions; (2) emissions per unit of fossil fuel consumption, because

almost all energy-related emissions involve the combustion of fossil fuels; (3) emissions per unit of total gross domestic product as a measure of national economic activity; and (4) emissions per capita.

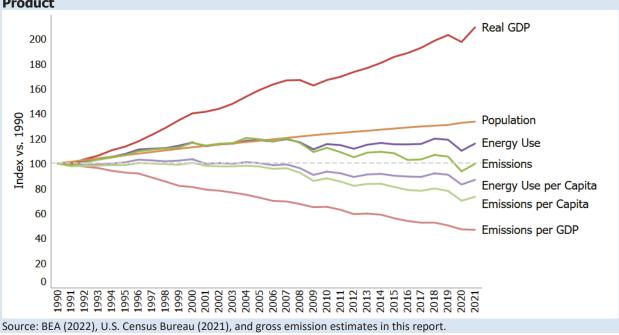
Table 2-14 provides data on various statistics related to U.S. greenhouse gas emissions normalized to 1990 as a baseline year. These values represent the relative change in each statistic since 1990. Greenhouse gas emissions in the United States have decreased at an average annual rate of 0.03 percent since 1990, although changes from year to year have been significantly larger. This growth rate is slightly slower than that for total energy use, overall gross domestic product (GDP) and national population (see Table 2-14 and Figure 2-16). The direction of these trends started to change after 2005, when greenhouse gas emissions, total energy use and associated fossil fuel consumption began to peak. Greenhouse gas emissions in the United States have decreased at an average annual rate of 1.0 percent since 2005. Fossil fuel consumption has also decreased at a slower rate than emissions since 2005, while total energy use, GDP, and national population, generally continued to increase, noting 2020 was impacted by the COVID-19 pandemic.

Table 2-14: Recent Trends in Various U.S. Data (Index 1990 = 100)

									Avg.	Avg.
									Annual	Annual
•	Variable	1990	2005	2017	2018	2019	2020	2021	Change	Change
Greenhouse Ga	as									
Emissions ^b		100	115	101	104	102	93	98	(+)%	-1.0%
Energy Use ^c		100	119	116	120	119	109	115	0.5%	-0.1%
GDP ^d		100	159	193	199	203	198	209	2.4%	1.8%
Population ^e		100	118	130	130	131	133	134	0.9%	0.8%

⁺ Absolute value does not exceed 0.05 percent.

Figure 2-16: U.S. Greenhouse Gas Emissions Per Capita and Per Dollar of Gross Domestic Product



^a Average annual growth rate.

^b Gross total GWP-weighted values.

^c Energy-content-weighted values (EIA 2023).

^d GDP in chained 2012 dollars (BEA 2022).

^e U.S. Census Bureau (2021).

2.3 Precursor Greenhouse Gas Emissions (CO, NO_x, NMVOCs, and SO₂)

The reporting requirements of the UNFCCC⁷ request that information be provided on emissions of compounds that are precursors to greenhouse gases, which include carbon monoxide (CO), nitrogen oxides (NO_x), nonmethane volatile organic compounds (NMVOCs), and sulfur dioxide (SO₂). These gases are not direct greenhouse gases, but can indirectly impact Earth's radiative balance, by altering the concentrations of other greenhouse gases (e.g., tropospheric ozone) and atmospheric aerosol (e.g., particulate sulfate). Carbon monoxide is produced when carbon-containing fuels are combusted incompletely in energy, transportation, and industrial processes, and is also emitted from practices such as agricultural burning and waste disposal and treatment. Anthropogenic sources of nitrogen oxides (i.e., NO and NO₂) are primarily fossil fuel combustion (for energy, transportation, industrial process) and agricultural burning. Anthropogenic sources of NMVOCs, which include hundreds of organic compounds that participate in atmospheric chemical reactions (i.e., propane, butane, xylene, toluene, ethane, and many others)—are emitted primarily from transportation, industrial processes, oil and natural gas production, waste practices, agricultural burning, and non-industrial consumption of organic solvents. In the United States, SO₂ is primarily emitted from coal combustion for electric power generation and the metals industry.

As noted above and summarized in Chapter 6 of IPCC (2021), these compounds can have important indirect effects of Earth's radiative balance. For example, reactions between NMVOCs and NO_x in the presence of sunlight lead to tropospheric ozone formation, a greenhouse gas. Concentrations of NMVOCs, NO_x , and CO can also impact the abundance and lifetime of primary greenhouse gases. This largely occurs by altering the atmospheric concentrations of the hydroxyl radical (OH), which is the main sink for atmospheric CH₄. For example, NO_x emissions can lead to increases in O_3 concentrations and subsequent OH production, which will increase the amount of OH molecules that are available to destroy CH₄. In contrast, NMVOCs and CO can both react directly with OH, leading to lower OH concentrations, a longer atmospheric lifetime of CH₄, and a decrease in CO_2 production (i.e., $CO+OH \rightarrow CO_2$). Changes in atmospheric CH₄ can also feedback on background concentrations of tropospheric O_3 . Other indirect impacts include the formation of sulfate and nitrate aerosol from emissions of NO_x and SO_2 , both of which have a net negative impact on radiative forcing.

Since 1970, the United States has published triennial estimates of emissions of CO, NO_x, NMVOCs, and SO₂ (EPA 2023), which are regulated under the Clean Air Act. Emissions of each of these precursor greenhouse gases has decreased significantly since 1990 as a result of implementation of Clean Air Act programs, as well as technological improvements.⁸ Precursor emission estimates for this report for 1990 through 2021 were obtained from data published on EPA's National Emissions Inventory (NEI) Air Pollutants Emissions Trends Data website (EPA 2023c). For Table 2-15, NEI-reported emissions of CO, NO_x, SO₂, and NMVOCs are recategorized from NEI Emissions Inventory System (EIS) source categories to those more closely aligned with UNFCCC reporting sectors and categories, based on and the cross walk detailed in Annex 6.3. Table 2-15 shows that fuel combustion accounts for the majority of emissions of these precursors. Industrial processes—such as the manufacture of chemical and allied products, metals processing, and industrial uses of solvents—are also significant sources of CO, NO_x, and NMVOCs. Precursor emissions from Agriculture and LULUCF categories are estimated separately and therefore are not taken from EPA (2023).

2-40 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁷ See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

⁸ More information is available online at: https://www.epa.gov/clean-air-act-overview/progress-cleaning-air-and-improving-peoples-health and https://gispub.epa.gov/neireport/2017/.

Table 2-15: Emissions of NO_x, CO, NMVOCs, and SO₂ (kt)

Gas/Activity	1990	2005	2017	2018	2019	2020	2021
NO _x	22,889	19,768	8,424	8,052	7,684	6,909	6,995
Energy	21,966	18,863	7,739	7,384	7,048	6,235	6,289
IPPU	774	672	455	461	440	393	394
Agriculture	13	15	14	14	14	14	14
LULUCF	53	166	143	120	110	191	222
Waste	84	51	74	73	73	76	76
CO	133,225	78,095	41,290	38,980	39,105	42,375	43,980
Energy	124,713	64,455	31,127	30,760	30,349	28,427	29,311
IPPU	4,099	1,701	999	1,022	1,011	855	855
Agriculture	315	363	339	338	337	336	336
LULUCF	3,069	10,397	7,643	5,678	6,226	11,415	12,136
Waste	1,028	1,178	1,182	1,182	1,182	1,342	1,342
NMVOCs	20,918	12,708	8,951	8,987	8,804	9,040	9,037
Energy	13,067	8,694	5,467	5,506	5,444	5,306	5,302
IPPU	6,982	3,668	3,126	3,119	2,996	3,366	3,366
Agriculture	+	194	202	206	208	196	196
LULUCF	NA	NA	NA	NA	NA	NA	NA
Waste	870	152	156	156	157	173	173
SO ₂	20,924	13,108	2,093	2,001	1,676	1,471	1,628
Energy	19,400	12,312	1,717	1,643	1,344	1,173	1,330
IPPU	1,488	776	353	335	309	266	266
Agriculture	+	NO	NO	NO	NO	+	+
LULUCF	NA	NA	NA	NA	NA	NA	NA
Waste	36	20	23	23	23	33	33

⁺ Does not exceed 0.5 kt.

Note: Totals by gas may not sum due to independent rounding.

Source: (EPA 2023) except for estimates from forest fires, grassland fires, and field burning of agricultural residues. Emission categories from EPA (2023) are aggregated into UNFCCC reporting sectors and categories

NA (Not Available)

NO (Not Occurring)

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 171 of 1050 PageID 3619

3. Energy

Energy-related activities were the primary sources of U.S. anthropogenic greenhouse gas emissions, accounting for 82.0 percent of total greenhouse gas emissions on a carbon dioxide (CO₂) equivalent basis in 2021. This included 96.5, 41.6, and 10.0 percent of the nation's CO₂, methane (CH₄), and nitrous oxide (N₂O) emissions, respectively. Energy-related CO₂ emissions alone constituted 76.6 percent of U.S. greenhouse gas emissions from all sources on a CO₂-equivalent basis, while the non-CO₂ emissions from energy-related activities represented a much smaller portion of total national emissions (5.4 percent collectively).

Emissions from fossil fuel combustion comprise the vast majority of energy-related emissions, with CO₂ being the primary gas emitted (see Figure 3-1 and Figure 3-2). Globally, approximately 33,000 million metric tons (MMT) of CO₂ were added to the atmosphere through the combustion of fossil fuels in 2021, of which the United States accounted for approximately 14 percent. Due to their relative importance over time (see Figure 3-2), fossil fuel combustion-related CO₂ emissions are considered in more detail than other energy-related emissions in this report (see Figure 3-3).

Fossil fuel combustion also emits CH_4 and N_2O . Stationary combustion of fossil fuels was the second largest source of N_2O emissions in the United States and mobile fossil fuel combustion was the fifth largest source. Energy-related activities other than fuel combustion, such as the production, transmission, storage, and distribution of fossil fuels, also emit greenhouse gases. These emissions consist primarily of fugitive CH_4 emissions from natural gas systems, coal mining, and petroleum systems.

 $^{^{1}}$ Estimates are presented in units of million metric tons of carbon dioxide equivalent (MMT CO₂ Eq.), which weight each gas by its global warming potential, or GWP, value. See section on global warming potentials in the Executive Summary.

² Global CO₂ emissions from fossil fuel combustion were taken from International Energy Agency *Global energy-related CO*₂ *emissions, 1990-2021 – Charts* Available at: https://www.iea.org/data-and-statistics/charts/global-energy-related-co2-emissions-1990-2021 (IEA 2022).

Figure 3-1: 2021 Energy Sector Greenhouse Gas Sources

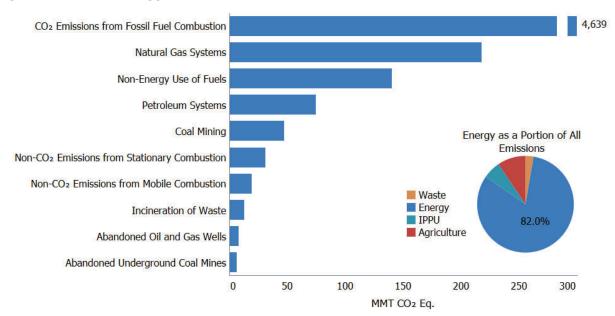


Figure 3-2: Trends in Energy Sector Greenhouse Gas Sources

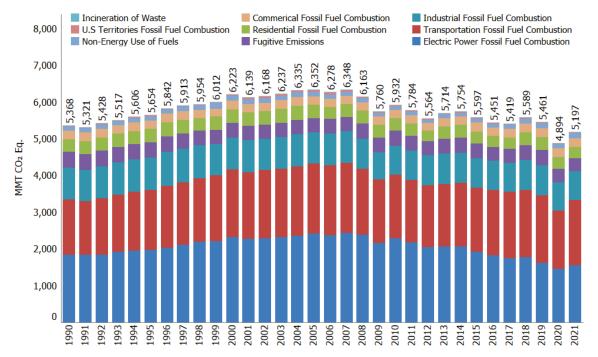


Figure 3-3: 2021 U.S. Fossil Carbon Flows

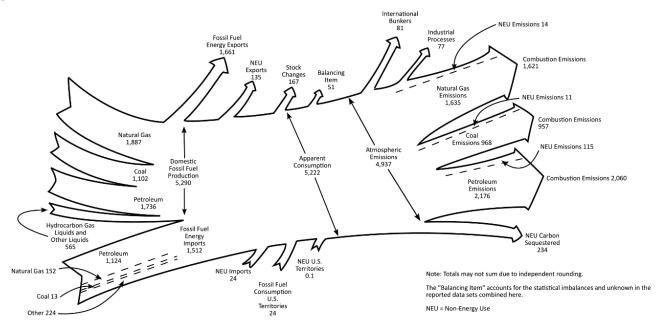


Table 3-1 summarizes emissions from the Energy sector in units of MMT CO₂ Eq., while unweighted gas emissions in kilotons (kt) are provided in Table 3-2. Overall, emissions due to energy-related activities were 5,196.6 MMT CO₂ Eq. in 2021,³ a decrease of 3.2 percent since 1990 and an increase of 6.2 percent since 2020. The increase in 2021 emissions was due to rebounding activity levels after the coronavirus (COVID-19) pandemic reduced overall demand for fossil fuels across all sectors in 2020. Longer term trends are driven by a number of factors including a shift from coal to natural gas and renewables in the electric power sector.

Table 3-1: CO₂, CH₄, and N₂O Emissions from Energy (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	4,899.8	5,928.9	5,038.0	5,204.7	5,084.9	4,544.8	4,855.0
Fossil Fuel Combustion	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Transportation	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4
Electricity Generation	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9
Industrial	852.4	850.8	789.0	813.5	815.9	767.9	775.6
Residential	338.6	358.9	293.4	338.2	341.4	313.2	313.3
Commercial	228.3	227.1	232.0	245.8	250.7	228.5	233.0
U.S. Territories	20.0	51.9	25.9	25.9	24.8	23.3	23.8
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
Natural Gas Systems	32.2	25.0	31.9	32.8	38.6	36.5	36.2
Petroleum Systems	9.5	10.2	24.5	36.1	46.9	29.1	24.7
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Coal Mining	4.6	4.2	3.2	3.1	3.0	2.2	2.5
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Biomass-Wood ^a	215.2	206.9	212.0	220.0	217.7	200.4	204.8
Biofuels-Ethanol ^a	103.6	113.3	120.2	124.3	113.6	69.6	80.2
International Bunker Fuels ^b	4.2	22.9	82.1	81.9	82.6	71.8	79.1
Biofuels-Biodiesel ^a	0.0	0.9	18.7	17.9	17.1	17.7	16.1

³ Following the current reporting requirements under the UNFCCC, this Inventory report presents CO₂ equivalent values based on the IPCC *Fifth Assessment Report* (AR5) GWP values. See Chapter 1, Introduction for more information.

Biomass-MSW ^a	18.5	14.7	16.1	16.1	15.7	15.6	15.3
CH ₄	407.0	354.7	336.5	341.7	334.1	312.0	302.3
Natural Gas Systems	215.1	203.3	186.2	194.3	193.6	185.3	181.4
Petroleum Systems	51.3	50.9	61.9	60.6	59.9	54.5	50.2
Coal Mining	108.1	71.8	61.4	59.1	53.0	46.2	44.7
Stationary Combustion	9.6	8.8	8.6	9.6	9.8	8.8	8.9
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.2	8.2
Abandoned Underground Coal	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Mines							
Mobile Combustion	7.2	4.4	2.9	2.9	2.9	2.6	2.6
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels ^b	0.2	0.1	0.1	0.1	0.1	0.1	0.1
N ₂ O	61	68	44	43	42	37	39
Stationary Combustion	22.3	30.5	25.3	25.1	22.2	20.7	22.1
Mobile Combustion	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels ^b	0.8	0.9	0.9	1.0	0.9	0.5	0.6
Total	5,368.0	6,351.5	5,418.7	5,589.5	5,460.6	4,894.0	5,196.6

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 3-2: CO₂, CH₄, and N₂O Emissions from Energy (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	4,899,841	5,928,911	5,038,003	5,204,696	5,084,935	4,544,784	4,855,040
Fossil Fuel							
Combustion	4,728,194	5,747,307	4,852,515	4,989,849	4,855,930	4,344,906	4,639,073
Non-Energy Use of							
Fuels	112,407	128,920	112,841	129,441	127,621	119,208	140,197
Natural Gas							
Systems	32,207	25,033	31,864	32,815	38,563	36,463	36,161
Petroleum Systems	9,519	10,221	24,462	36,102	46,874	29,081	24,669
Incineration of							
Waste	12,900	13,254	13,161	13,339	12,948	12,921	12,476
Coal Mining	4,606	4,170	3,153	3,141	2,992	2,198	2,456
Abandoned Oil and							
Gas Wells	7	7	7	7	8	7	7
Biomass-Wood ^a	215,186	206,901	211,965	220,005	217,692	200,421	204,848
Biofuels-Ethanol ^a	103,634	113,328	120,192	124,279	113,632	69,638	80,180
International							
Bunker Fuels ^b	4,227	22,943	82,088	81,917	82,578	71,848	79,064
Biofuels-Biodiesel ^a	0	<i>856</i>	18,705	17,936	17,080	17,678	16,112
Biomass-MSW ^a	18,534	14,722	16,130	16,115	15,709	15,614	15,329
CH ₄	14,536	12,668	12,018	12,204	11,933	11,144	10,798
Natural Gas							
Systems	7,680	7,260	6,652	6,939	6,914	6,619	6,478
Petroleum Systems	1,833	1,819	2,209	2,165	2,138	1,945	1,791
Coal Mining	3,860	2,566	2,192	2,110	1,893	1,648	1,595

^a Emissions from biomass and biofuel consumption are not included specifically in summing energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

^b Emissions from International Bunker Fuels are not included in totals. These values are presented for informational purposes only, in line with the *2006 IPCC Guidelines* and UNFCCC reporting obligations.

Stationary							
Combustion	344	313	307	344	351	313	319
Abandoned Oil and							
Gas Wells	274	289	295	296	297	295	295
Abandoned							
Underground							
Coal Mines	288	264	257	247	237	232	228
Mobile							
Combustion	258	158	105	102	103	92	93
Incineration of							
Waste	+	+	+	+	+	+	+
International							
Bunker Fuels ^b	7	5	4	4	4	3	3
N_2O	231	256	167	163	157	140	148
Stationary							
Combustion	84	115	95	95	84	78	84
Mobile							
Combustion	145	140	70	66	72	61	63
Incineration of							
Waste	2	1	1	1	1	1	1
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas							
Systems	+	+	+	+	+	+	+
International							
Bunker Fuels ^b	3	3	4	4	3	2	2

⁺ Does not exceed 0.5 kt.

Note: Totals by gas may not sum due to independent rounding.

Emissions estimates reported in the Energy chapter from fossil fuel combustion and fugitive sources include those from all 50 states, including Hawaii and Alaska, and the District of Columbia. Emissions are also included from U.S. Territories to the extent they are known to occur (e.g., coal mining does not occur in U.S. Territories). For some sources there is a lack of detailed information on U.S. Territories including some non-CO₂ emissions from biomass combustion. As part of continuous improvement efforts, EPA reviews this on an ongoing basis to ensure emission sources are included across all geographic areas including U.S. Territories if they are occurring. See Annex 5 for more information on EPA's assessment of the sources not included in this Inventory.

Each year, some emission and sink estimates in the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. Key updates in this year's Inventory include, updates to the transportation methodology which use distributions of vehicle miles traveled (VMT) and fuel use from EPA's MOVES3 model to estimate vehicle emissions by vehicle class, updates to the CH₄ and N₂O emission factors for alternative fuel vehicles based on the GREET2022 model, revisions to methods for estimating CH₄ from both Natural Gas Systems and Petroleum Systems to incorporate additional basin-level data from GHGRP Subpart W for several emission sources in the onshore production segment, changes to the Non-Energy Use of Fossil Fuel methodology (e.g., updated energy consumption statistics, updated polyester fiber and acetic acid production data, updated import and export data, and updated shipment data from the U.S census Bureau), and accounting for biogenic emissions from combusted MSW within Biomass estimates. The impact of these recalculations averaged 9.6 MMT CO₂ Eq. (+0.2 percent) per year across the time series. In addition, the GWPs for calculating CO₂-equivalent totals emissions of CH₄ and N₂O have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment*

^a Emissions from biomass and biofuel consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

^b Emissions from international bunker fuels are not included in totals. These values are presented for informational purposes only, in line with the *2006 IPCC Guidelines* and UNFCCC reporting obligations.

Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous Inventories). The combined impact of these recalculations resulted in an average increase of 40.2 MMT CO_2 Eq. (0.7 percent) across the time series. For more information on specific methodological updates, please see the Recalculations Discussion section for each category in this chapter.

Box 3-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines). Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and removals provided in the Energy chapter do not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals from energy-related activities.

Energy Data from EPA's Greenhouse Gas Reporting Program

EPA's Greenhouse Gas Reporting Program (GHGRP)⁴ dataset and the data presented in this Inventory are complementary. The Inventory was used to guide the development of the GHGRP, particularly in terms of scope and coverage of both sources and gases. The GHGRP dataset continues to be an important resource for the Inventory, providing not only annual emissions information, but also other annual information, such as activity data and emission factors that can improve and refine national emission estimates and trends over time. GHGRP data also allow EPA to disaggregate national inventory estimates in new ways that can highlight differences across regions and sub-categories of emissions, along with enhancing application of QA/QC procedures and assessment of uncertainties.

EPA uses annual GHGRP data in a number of Energy sector categories to improve the national estimates presented in this Inventory consistent with IPCC guidelines (see Box 3-3 of this chapter, and Sections 3.3 Incineration of Waste, 3.4 Coal Mining, 3.6 Petroleum Systems, and 3.7 Natural Gas Systems). Methodologies used in EPA's GHGRP are consistent with IPCC guidelines, including higher tier methods. Under EPA's GHGRP, facilities collect detailed information specific to their operations according to detailed measurement standards. It should be noted that the definitions and provisions for reporting fuel types in EPA's GHGRP may differ from those used in the Inventory in meeting the UNFCCC reporting guidelines. In line with the UNFCCC reporting guidelines, the Inventory report is a comprehensive accounting of all emissions from fuel types identified in the IPCC guidelines and provides a separate reporting of emissions from biomass.

In addition to using GHGRP data to estimate emissions (Sections 3.3 Incineration of Waste, 3.4 Coal Mining, 3.6 Petroleum Systems, and 3.7 Natural Gas Systems), EPA also uses the GHGRP fuel consumption activity data in the Energy sector to disaggregate industrial end-use sector emissions in the category of CO₂ Emissions from Fossil Fuel Combustion, for use in reporting emissions in Common Reporting Format (CRF) tables (See Box 3-3). The industrial end-use sector activity data collected for the Inventory (EIA 2022) represent aggregated data for the industrial end-use sector. EPA's GHGRP collects industrial fuel consumption activity data by individual

_

⁴ On October 30, 2009, the U.S. Environmental Protection Agency (EPA) published a rule requiring annual reporting of greenhouse gas data from large greenhouse gas emission sources in the United States. Implementation of the rule, codified at 40 CFR Part 98, is referred to as EPA's Greenhouse Gas Reporting Program (GHGRP).

⁵ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

categories within the industrial end-use sector. Therefore, GHGRP data are used to provide a more detailed breakout of total emissions in the industrial end-use sector within that source category.

As indicated in the respective Planned Improvements sections for source categories in this chapter, EPA continues to examine the uses of facility-level GHGRP data to improve the national estimates presented in this Inventory. See Annex 9 for more information on use of EPA's GHGRP in the Inventory.

3.1 Fossil Fuel Combustion (CRF Source Category 1A)

Emissions from the combustion of fossil fuels for energy include the greenhouse gases CO_2 , CH_4 , and N_2O . Given that CO_2 is the primary gas emitted from fossil fuel combustion and represents the largest share of U.S. total emissions, CO_2 emissions from fossil fuel combustion are discussed at the beginning of this section. An overview of CH_4 and N_2O emissions from the combustion of fuels in stationary sources is then presented, followed by fossil fuel combustion emissions for all three gases by sector: electric power, industrial, residential, commercial, U.S. Territories, and transportation.

Methodologies for estimating CO₂ emissions from fossil fuel combustion differ from the estimation of CH₄ and N₂O emissions from stationary combustion and mobile combustion. Thus, three separate descriptions of methodologies, uncertainties, recalculations, and planned improvements are provided at the end of this section. Total CO₂, CH₄, and N₂O emissions from fossil fuel combustion are presented in Table 3-3 and Table 3-4.

Table 3-3: CO₂, CH₄, and N₂O Emissions from Fossil Fuel Combustion (MMT CO₂ Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
CH ₄	16.8	13.2	11.5	12.5	12.7	11.3	11.5
N_2O	60.7	67.6	43.8	42.6	41.2	36.8	38.8
Total	4,805.7	5,828.0	4,907.9	5,045.0	4,909.8	4,393.0	4,689.4

Note: Totals may not sum due to independent rounding.

Table 3-4: CO₂, CH₄, and N₂O Emissions from Fossil Fuel Combustion (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	4,728,194	5,747,307	4,852,515	4,989,849	4,855,930	4,344,906	4,639,073
CH_4	601	471	412	446	454	405	412
N ₂ O	229	255	165	161	155	139	146

CO₂ from Fossil Fuel Combustion

Carbon dioxide is the primary gas emitted from fossil fuel combustion and represents the largest share of U.S. total greenhouse gas emissions. Carbon dioxide emissions from fossil fuel combustion are presented in Table 3-5. In 2021, CO_2 emissions from fossil fuel combustion increased by 6.8 percent relative to the previous year (as shown in Table 3-6). The increase in CO_2 emissions from fossil fuel consumption was a result of a 5.7 percent increase in fossil fuel energy use. This increase in fossil fuel consumption was due primarily to rebounding economic activity after the COVID-19 pandemic. Carbon dioxide emissions from natural gas increased by 8.6 MMT CO_2 Eq., a 0.5 percent increase from 2020. In a shift from recent trends, CO_2 emissions from coal consumption increased by 121.7 MMT CO_2 Eq., a 14.6 percent increase from 2020. The increase in natural gas consumption and emissions in 2021 is observed across all sectors except the Electric Power sector and U.S. Territories, while the coal increase is primarily in the Electric Power sector. Emissions from petroleum use also increased 163.9 MMT CO_2 Eq. (8.6

percent) from 2020 to 2021. In 2021, CO_2 emissions from fossil fuel combustion were 4,639.1 MMT CO_2 Eq., or 1.9 percent below emissions in 1990 (see Table 3-5).⁶

Table 3-5: CO₂ Emissions from Fossil Fuel Combustion by Fuel Type and Sector (MMT CO₂ Eq.)

Fuel/Sector	1990	2005	2017	2018	2019	2020	2021
Coal	1,719.8	2,113.7	1,270.0	1,211.6	1,028.2	835.6	957.3
Residential	3.0	0.8	NO	NO	NO	NO	NO
Commercial	12.0	9.3	2.0	1.8	1.6	1.4	1.4
Industrial	157.8	117.8	58.7	54.4	49.5	43.0	43.0
Transportation	NO						
Electric Power	1,546.5	1,982.8	1,207.1	1,152.9	973.5	788.2	909.9
U.S. Territories	0.5	3.0	2.3	2.6	3.6	3.1	2.9
Natural Gas	998.6	1,166.2	1,433.2	1,592.0	1,649.3	1,612.4	1,621.0
Residential	237.8	262.2	241.5	273.8	275.5	256.4	258.6
Commercial	142.0	162.9	173.2	192.5	192.9	173.8	180.9
Industrial	407.4	387.8	468.1	493.5	501.5	486.1	499.6
Transportation	36.0	33.1	42.3	50.9	58.9	58.7	65.1
Electric Power	175.4	318.9	505.6	577.9	616.6	634.8	612.9
U.S. Territories	NO	1.3	2.5	3.3	3.8	2.6	3.9
Petroleum	2,009.2	2,467.0	2,148.8	2,185.8	2,178.1	1,896.5	2,060.4
Residential	97.8	95.9	51.9	64.4	65.9	56.8	54.7
Commercial	74.3	54.9	56.8	51.5	56.2	53.2	50.7
Industrial	287.1	345.2	262.2	265.6	264.9	238.9	232.9
Transportation	1,432.9	1,825.5	1,737.8	1,762.0	1,757.5	1,513.9	1,687.3
Electric Power	97.5	98.0	18.9	22.2	16.2	16.2	17.7
U.S. Territories	19.5	47.6	21.1	20.1	17.5	17.6	17.0
Geothermal ^a	0.5	0.5	0.4	0.4	0.4	0.4	0.4
Electric Power	0.5	0.5	0.4	0.4	0.4	0.4	0.4
Total	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

Trends in CO₂ emissions from fossil fuel combustion are influenced by many long-term and short-term factors. On a year-to-year basis, the overall demand for fossil fuels in the United States and other countries generally fluctuates in response to changes in general economic conditions, energy prices, weather, and the availability of non-fossil alternatives. For example, in a year with increased consumption of goods and services, low fuel prices, severe summer and winter weather conditions, nuclear plant closures, and lower precipitation feeding hydroelectric dams, there would likely be proportionally greater fossil fuel consumption than a year with poor economic performance, high fuel prices, mild temperatures, and increased output from nuclear and hydroelectric plants. The 2020 to 2021 trends reflect impacts of the COVID-19 pandemic which generally led to a reduction in demand for fossil fuels in 2020, but an increase in demand as activities rebounded in 2021.

Longer-term changes in energy usage patterns, however, tend to be more a function of aggregate societal trends that affect the scale of energy use (e.g., population, number of cars, size of houses, and number of houses), the efficiency with which energy is used in equipment (e.g., cars, HVAC systems, power plants, steel mills, and light bulbs), and social planning and consumer behavior (e.g., walking, bicycling, or telecommuting to work instead of driving).

⁶ An additional discussion of fossil fuel emission trends is presented in the Trends in U.S. Greenhouse Gas Emissions chapter.

^a Although not technically a fossil fuel, geothermal energy-related CO₂ emissions are included for reporting purposes. The source of CO₂ is non-condensable gases in subterranean heated water.

Carbon dioxide emissions also depend on the source of energy and its carbon (C) intensity. The amount of C in fuels varies significantly by fuel type. For example, coal contains the highest amount of C per unit of useful energy. Petroleum has roughly 75 percent of the C per unit of energy as coal, and natural gas has only about 55 percent. Table 3-6 shows annual changes in emissions during the last five years for coal, petroleum, and natural gas in selected sectors.

Table 3-6: Annual Change in CO₂ Emissions and Total 2021 CO₂ Emissions from Fossil Fuel Combustion for Selected Fuels and Sectors (MMT CO₂ Eq. and Percent)

Sector	Fuel Type	2017	to 2018	2018	to 2019	2019	to 2020	2020	to 2021	Total 2021
Transportation	Petroleum	24.1	1.4%	-4.5	-0.3%	-243.6	-13.9%	173.5	11.5%	1,687.3
Electric Power	Coal	-54.2	-4.5%	-179.3	-15.6%	-185.4	-19.0%	121.8	15.5%	909.9
Electric Power	Natural Gas	72.3	14.3%	38.7	6.7%	18.2	3.0%	-22.0	-3.5%	612.9
Industrial	Natural Gas	25.3	5.4%	8.0	1.6%	-15.5	-3.1%	13.6	2.8%	499.6
Residential	Natural Gas	32.3	13.4%	1.7	0.6%	-19.1	-6.9%	2.3	0.9%	258.6
Commercial	Natural Gas	19.3	11.2%	0.4	0.2%	-19.1	-9.9%	7.0	4.0%	180.9
Transportation	All Fuels ^a	32.8	1.8%	3.5	0.2%	-243.9	-13.4%	179.9	11.4%	1,752.4
Electric Power	All Fuels ^a	21.4	1.2%	-146.7	-8.4%	-167.2	-10.4%	101.3	7.0%	1,540.9
Industrial	All Fuels ^a	24.5	3.1%	2.4	0.3%	-48.0	-5.9%	7.7	1.0%	775.6
Residential	All Fuels ^a	44.8	15.3%	3.2	0.9%	-28.2	-8.3%	0.2	0.1%	313.3
Commercial	All Fuels ^a	13.8	6.0%	4.9	2.0%	-22.2	-8.9%	4.6	2.0%	233.0
All Sectors ^{a,b}	All Fuels ^a	137.3	2.8%	-133.9	-2.7%	-511.0	-10.5%	294.2	6.8%	4,639.1

^a Includes sector and fuel combinations not shown in this table.

As shown in Table 3-6, recent trends in CO_2 emissions from fossil fuel combustion show a 2.8 percent increase from 2017 to 2018, a 2.7 percent decrease from 2018 to 2019, a 10.5 percent decrease from 2019 to 2020, and a 6.8 percent increase from 2020 to 2021. These changes contributed to an overall 4.4 percent decrease in CO_2 emissions from fossil fuel combustion from 2017 to 2021.

Recent trends in CO₂ emissions from fossil fuel combustion are largely driven by the electric power sector, which until 2017 has accounted for the largest portion of these emissions. The types of fuels consumed to produce electricity have changed in recent years. Electric power sector consumption of natural gas primarily increased due to increased production capacity as natural gas-fired plants replaced coal-fired plants and increased electricity demand related to heating and cooling needs (EIA 2018; EIA 2023d). Total net electric power generation from all fossil and non-fossil sources increased by 3.6 percent from 2017 to 2018, decreased by 1.3 percent from 2018 to 2019, decreased by 2.9 percent from 2019 to 2020, and increased by 2.7 percent from 2020 to 2021 (EIA 2023a). Carbon dioxide emissions from the electric power sector increased from 2020 to 2021 by 7.0 percent due to increased production and the increased use of coal for electric power generation. Carbon dioxide emissions from coal consumption for electric power generation decreased by 24.6 percent overall since 2017, but increased by 15.5 percent from 2020 to 2021.

The recent trends in CO_2 emissions from fossil fuel combustion also follow changes in heating degree days (see Box 3-2). Emissions from natural gas consumption in the residential and commercial sectors increased by 7.1 percent and 4.4 percent from 2017 to 2021, respectively. This trend can be partially attributed to a 2.5 percent increase in heating degree days from 2017 to 2021, which led to an increased demand for heat in these sectors. Industrial consumption of natural gas is dependent on market effects of supply and demand in addition to weather-related heating needs.

Petroleum use in the transportation sector is another major driver of emissions, representing the largest source of CO₂ emissions from fossil fuel combustion in 2021. Emissions from petroleum consumption for transportation have

^b Includes U.S. Territories.

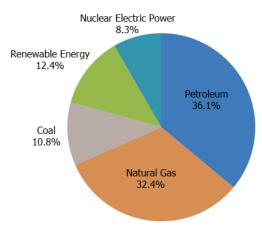
⁷ Based on national aggregate carbon content of all coal, natural gas, and petroleum fuels combusted in the United States. See Annex 2.2 for more details on fuel carbon contents.

decreased by 2.9 percent since 2017 and are primarily attributed to a 0.5 percent decrease in VMT over the same time period. Beginning with 2017, the transportation sector is the largest source of national CO₂ emissions—whereas in prior years, electric power was the largest source sector.

The overall 2020 to 2021 trends were largely driven by the gradual recovery from the COVID-19 pandemic, which saw reduced economic activity in 2020 and caused changes in energy demand and supply patterns across different sectors. The recovery from the COVID-19 pandemic generally led to increased energy use and emissions across all economic sectors from 2020 to 2021. The increase in emissions from 2020 to 2021 was also due to a reversal in recent trends in coal use. In recent years the trend has been one of decreased coal use however, from 2020 to 2021 overall use of coal increased by 14.6 percent (EIA 2023a).

In the United States, 79.3 percent of the energy used in 2021 was produced through the combustion of fossil fuels such as petroleum, natural gas, and coal (see Figure 3-4 and Figure 3-5). Specifically, petroleum supplied the largest share of domestic energy demands, accounting for 36 percent of total U.S. energy used in 2021. Natural gas and coal followed in order of fossil fuel energy demand importance, accounting for approximately 32 percent and 11 percent of total U.S. energy used, respectively. Petroleum was consumed primarily in the transportation enduse sector and the majority of coal was used in the electric power sector. Natural gas was broadly consumed in all end-use sectors except transportation (see Figure 3-6) (EIA 2022a). The remaining portion of energy used in 2021 was supplied by nuclear electric power (8 percent) and by a variety of renewable energy sources (12 percent), primarily wind energy, hydroelectric power, solar, geothermal and biomass (EIA 2022a). 8





-

⁸ Renewable energy, as defined in EIA's energy statistics, includes the following energy sources: hydroelectric power, geothermal energy, biomass, solar energy, and wind energy.

Figure 3-5: Annual U.S. Energy Use

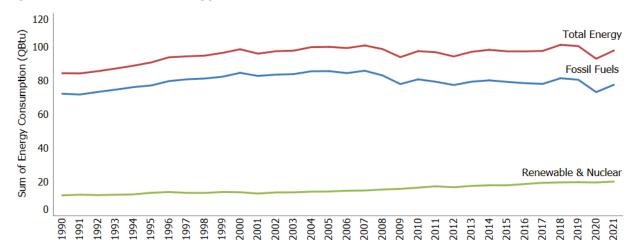
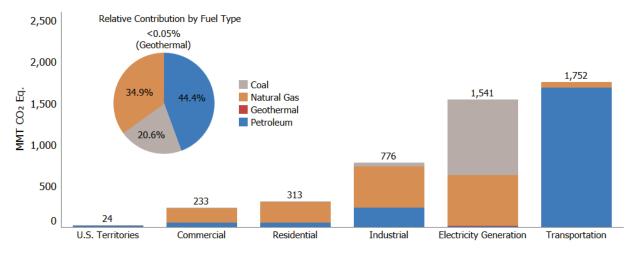


Figure 3-6: 2021 CO₂ Emissions from Fossil Fuel Combustion by Sector and Fuel Type



Fossil fuels are generally combusted for the purpose of producing energy for useful heat and work. During the combustion process, the C stored in the fuels is oxidized and emitted as CO₂ and smaller amounts of other gases, including CH₄, carbon monoxide (CO), and non-methane volatile organic compounds (NMVOCs). These other C-containing non-CO₂ gases are emitted as a byproduct of incomplete fuel combustion, but are, for the most part, eventually oxidized to CO₂ in the atmosphere. Therefore, as per IPCC guidelines it is assumed all of the C in fossil fuels used to produce energy is eventually converted to atmospheric CO₂.

Box 3-2: Weather and Non-Fossil Energy Effects on CO₂ Emissions from Fossil Fuel Combustion Trends

The United States in 2021 experienced a colder winter overall compared to 2020, as heating degree days increased 0.5 percent. Colder winter conditions compared to 2020 impacted the amount of energy required for heating. In 2021 heating degree days in the United States were 9.1 percent below normal (see Figure 3-7). Cooling degree days decreased by 1.8 percent compared to 2020, which decreased demand for air conditioning in the residential and commercial sector. Cooler summer conditions compared to 2020 impacted the amount of

⁹ See the sections entitled Stationary Combustion and Mobile Combustion in this chapter for information on non-CO₂ gas emissions from fossil fuel combustion.

energy required for cooling. 2020 cooling degree days in the United States were 11.4 percent above normal (see Figure 3-8) (EIA 2023a). ¹⁰ The combination of colder winter and summer conditions led to an overall increase in residential and commercial energy consumption of 0.1 and 2.0 percent, respectively, relative to 2020.

Figure 3-7: Annual Deviations from Normal Heating Degree Days for the United States (1970–2021, Index Normal = 100)

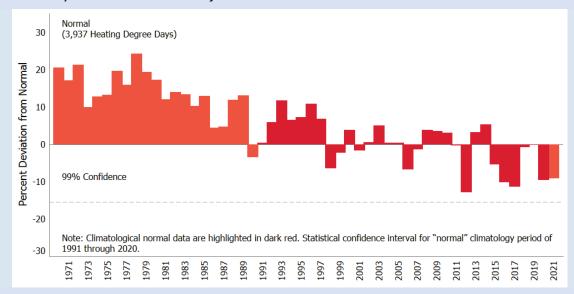
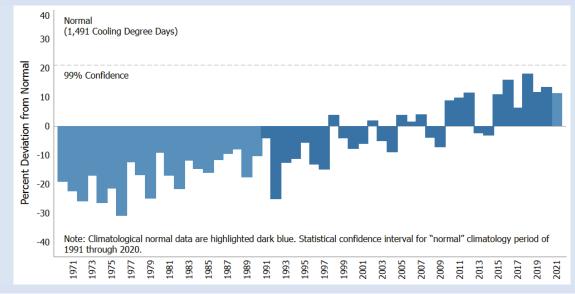


Figure 3-8: Annual Deviations from Normal Cooling Degree Days for the United States (1970–2021, Index Normal = 100)



3-12 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

 $^{^{10}}$ Degree days are relative measurements of outdoor air temperature. Heating degree days are deviations of the mean daily temperature below 65 degrees Fahrenheit, while cooling degree days are deviations of the mean daily temperature above 65 degrees Fahrenheit. Heating degree days have a considerably greater effect on energy demand and related emissions than do cooling degree days. Excludes Alaska and Hawaii. Normals are based on data from 1991 through 2020. The variation in these normals during this time period was ± 16 percent and ± 27 percent for heating and cooling degree days, respectively (99 percent confidence interval).

The carbon intensity of the electric power sector is impacted by the amount of non-fossil energy sources of electricity. The utilization (i.e., capacity factors)¹¹ of nuclear power plants in 2021 remained high at 93 percent. In 2021, nuclear power represented 20 percent of total electricity generation. Since 1990, the wind and solar power sectors have shown strong growth and have become relatively important electricity sources. Between 1990 and 2021, renewable energy generation (in kWh) from solar and wind energy have increased from 0.1 percent in 1990 to 12 percent in 2021 of total electricity generation, which helped drive the decrease in the carbon intensity of the electricity supply in the United States.

Stationary Combustion

The direct combustion of fuels by stationary sources in the electric power, industrial, commercial, and residential sectors represent the greatest share of U.S. greenhouse gas emissions. Table 3-7 presents CO₂ emissions from fossil fuel combustion by stationary sources. The CO2 emitted is closely linked to the type of fuel being combusted in each sector (see Methodology section of CO₂ from Fossil Fuel Combustion). In addition to the CO₂ emitted from fossil fuel combustion, CH4 and N2O are emitted as well. Table 3-8 and Table 3-9 present CH4 and N2O emissions from the combustion of fuels in stationary sources. The CH₄ and N₂O emissions are linked to the type of fuel being combusted as well as the combustion technology (see Methodology section for CH₄ and N₂O from Stationary Combustion).

Table 3-7: CO₂ Emissions from Stationary Fossil Fuel Combustion (MMT CO₂ Eq.)

Sector/Fuel Type	1990	2005	2017	2018	2019	2020	2021
Electric Power	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9
Coal	1,546.5	1,982.8	1,207.1	1,152.9	973.5	788.2	909.9
Natural Gas	175.4	318.9	505.6	577.9	616.6	634.8	612.9
Fuel Oil	97.5	98.0	18.9	22.2	16.2	16.2	17.7
Geothermal	0.5	0.5	0.4	0.4	0.4	0.4	0.4
Industrial	852.4	850.8	789.0	813.5	815.9	767.9	775.6
Coal	157.8	117.8	58.7	54.4	49.5	43.0	43.0
Natural Gas	407.4	387.8	468.1	493.5	501.5	486.1	499.6
Fuel Oil	287.1	345.2	262.2	265.6	264.9	238.9	232.9
Residential	338.6	358.9	293.4	338.2	341.4	313.2	313.3
Coal	3.0	0.8	NO	NO	NO	NO	NO
Natural Gas	237.8	262.2	241.5	273.8	275.5	256.4	258.6
Fuel Oil	97.8	95.9	51.9	64.4	65.9	56.8	54.7
Commercial	228.3	227.1	232.0	245.8	250.7	228.5	233.0
Coal	12.0	9.3	2.0	1.8	1.6	1.4	1.4
Natural Gas	142.0	162.9	173.2	192.5	192.9	173.8	180.9
Fuel Oil	74.3	54.9	56.8	51.5	56.2	53.2	50.7
U.S. Territories	20.0	51.9	25.9	25.9	24.8	23.3	23.8
Coal	0.5	3.0	2.3	2.6	3.6	3.1	2.9
Natural Gas	NO	1.3	2.5	3.3	3.8	2.6	3.9
Fuel Oil	19.5	47.6	21.1	20.1	17.5	17.6	17.0
Total	3,259.3	3,888.8	3,072.4	3,176.9	3,039.5	2,772.4	2,886.6

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

 $^{^{11}}$ The capacity factor equals generation divided by net summer capacity. Summer capacity is defined as "The maximum output that generating equipment can supply to system load, as demonstrated by a multi-hour test, at the time of summer peak demand (period of June 1 through September 30)" (EIA 2020a). Data for both the generation and net summer capacity are from EIA (2023a).

Table 3-8: CH₄ Emissions from Stationary Combustion (MMT CO₂ Eq.)

Sector/Fuel Type	1990	2005	2017	2018	2019	2020	2021
Electric Power	0.5	1.0	1.2	1.4	1.4	1.4	1.4
Coal	0.4	0.4	0.3	0.3	0.2	0.2	0.2
Fuel Oil	+	+	+	+	+	+	+
Natural gas	0.1	0.5	1.0	1.1	1.2	1.2	1.2
Wood	+	+	+	+	+	+	+
Industrial	2.0	1.9	1.7	1.7	1.7	1.6	1.6
Coal	0.5	0.3	0.2	0.2	0.1	0.1	0.1
Fuel Oil	0.2	0.2	0.2	0.2	0.2	0.2	0.1
Natural gas	0.2	0.2	0.2	0.2	0.3	0.2	0.3
Wood	1.2	1.2	1.2	1.1	1.1	1.1	1.1
Commercial	1.2	1.2	1.3	1.4	1.4	1.3	1.3
Coal	+	+	+	+	+	+	+
Fuel Oil	0.3	0.2	0.2	0.2	0.2	0.2	0.2
Natural gas	0.4	0.4	0.4	0.5	0.5	0.4	0.5
Wood	0.5	0.6	0.7	0.7	0.7	0.7	0.7
Residential	5.9	4.5	4.2	5.1	5.3	4.4	4.6
Coal	0.3	0.1	NO	NO	NO	NO	NO
Fuel Oil	0.4	0.4	0.2	0.3	0.3	0.2	0.2
Natural Gas	0.6	0.7	0.6	0.7	0.7	0.6	0.6
Wood	4.6	3.4	3.4	4.2	4.4	3.5	3.7
U.S. Territories	+	0.1	+	+	+	+	+
Coal	+	+	+	+	+	+	+
Fuel Oil	+	0.1	+	+	+	+	+
Natural Gas	NO	+	+	+	+	+	+
Wood	NE						
Total	9.6	8.8	8.6	9.6	9.8	8.8	8.9

⁺ Does not exceed 0.05 MMT CO₂ Eq.

NO (Not Occurring)

NE (Not Estimated)

Note: Totals may not sum due to independent rounding.

Table 3-9: N₂O Emissions from Stationary Combustion (MMT CO₂ Eq.)

Sector/Fuel Type	1990	2005	2017	2018	2019	2020	2021
Electric Power	18.2	26.7	22.0	21.7	18.8	17.5	19.0
Coal	17.9	24.9	18.8	18.1	14.8	13.5	15.1
Fuel Oil	0.1	0.1	+	+	+	+	+
Natural Gas	0.3	1.7	3.2	3.6	3.9	4.0	3.9
Wood	+	+	+	+	+	+	+
Industrial	2.7	2.6	2.3	2.2	2.2	2.1	2.1
Coal	0.7	0.5	0.2	0.2	0.2	0.2	0.2
Fuel Oil	0.4	0.5	0.3	0.3	0.3	0.3	0.3
Natural Gas	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Wood	1.5	1.5	1.5	1.4	1.4	1.4	1.4
Commercial	0.3	0.3	0.3	0.3	0.3	0.3	0.3
Coal	+	+	+	+	+	+	+
Fuel Oil	0.2	0.1	0.1	0.1	0.1	0.1	0.1
Natural Gas	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Wood	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Residential	0.9	0.8	0.7	0.8	0.8	0.7	0.7
Coal	+	+	NO	NO	NO	NO	NO
Fuel Oil	0.2	0.2	0.1	0.2	0.2	0.1	0.1

Total	22.3	30.5	25.3	25.1	22.2	20.7	22.1
Wood	NE						
Natural Gas	NO	+	+	+	+	+	+
Fuel Oil	+	0.1	+	+	+	+	+
Coal	+	+	+	+	+	+	+
U.S. Territories	+	0.1	0.1	0.1	0.1	0.1	0.1
Wood	0.6	0.4	0.4	0.5	0.5	0.4	0.5
Natural Gas	0.1	0.1	0.1	0.1	0.1	0.1	0.1

⁺ Does not exceed 0.05 MMT CO₂ Eq.

NO (Not Occurring)

NE (Not Estimated)

Note: Totals may not sum due to independent rounding.

Fossil Fuel Combustion Emissions by Sector

Table 3-10 provides an overview of the CO₂, CH₄, and N₂O emissions from fossil fuel combustion by sector, including transportation, electric power, industrial, residential, commercial, and U.S. Territories.

Table 3-10: CO₂, CH₄, and N₂O Emissions from Fossil Fuel Combustion by Sector (MMT CO₂ Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	1,514.6	1,900.0	1,801.6	1,833.3	1,838.3	1,591.2	1,771.7
CO ₂	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4
CH ₄	7.2	4.4	2.9	2.9	2.9	2.6	2.6
N_2O	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Electric Power	1,838.7	2,427.8	1,755.3	1,776.5	1,626.9	1,458.5	1,561.3
CO ₂	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9
CH ₄	0.5	1.0	1.2	1.4	1.4	1.4	1.4
N_2O	18.2	26.7	22.0	21.7	18.8	17.5	19.0
Industrial	857.2	855.4	793.0	817.5	819.8	771.6	779.3
CO ₂	852.4	850.8	789.0	813.5	815.9	767.9	775.6
CH ₄	2.0	1.9	1.7	1.7	1.7	1.6	1.6
N_2O	2.7	2.6	2.3	2.2	2.2	2.1	2.1
Residential	345.4	364.2	298.3	344.2	347.6	318.3	318.6
CO_2	338.6	358.9	293.4	338.2	341.4	313.2	313.3
CH ₄	5.9	4.5	4.2	5.1	5.3	4.4	4.6
N_2O	0.9	0.8	0.7	0.8	0.8	0.7	0.7
Commercial	229.8	228.6	233.6	247.5	252.4	230.1	234.6
CO ₂	228.3	227.1	232.0	245.8	250.7	228.5	233.0
CH ₄	1.2	1.2	1.3	1.4	1.4	1.3	1.3
N_2O	0.3	0.3	0.3	0.3	0.3	0.3	0.3
U.S. Territories ^a	20.1	52.1	26.0	26.0	24.9	23.4	23.9
Total	4,805.7	5,828.0	4,907.9	5,045.0	4,909.8	4,393.0	4,689.4

^a U.S. Territories are not apportioned by sector, and emissions shown in the table are total greenhouse gas emissions from all fuel combustion sources.

Note: Totals may not sum due to independent rounding.

Other than greenhouse gases CO_2 , CH_4 , and N_2O , gases emitted from stationary combustion include the greenhouse gas precursors nitrogen oxides (NO_x), CO, NMVOCs, and SO_2 . Methane and N_2O emissions from stationary combustion sources depend upon fuel characteristics, size and vintage of combustion device, along with combustion technology, pollution control equipment, ambient environmental conditions, and operation and maintenance practices. Nitrous oxide emissions from stationary combustion are closely related to air-fuel mixes and combustion temperatures, as well as the characteristics of any pollution control equipment that is employed.

Methane emissions from stationary combustion are primarily a function of the CH₄ content of the fuel and combustion efficiency.

Mobile combustion also produces emissions of CH₄, N₂O, and greenhouse gas precursors including NO_x, CO, and NMVOCs. As with stationary combustion, N₂O and NO_x emissions from mobile combustion are closely related to fuel characteristics, air-fuel mixes, combustion temperatures, and the use of pollution control equipment. Nitrous oxide from mobile sources, in particular, can be formed by the catalytic processes used to control NOx, CO, and hydrocarbon emissions. Carbon monoxide emissions from mobile combustion are significantly affected by combustion efficiency and the presence of post-combustion emission controls. Carbon monoxide emissions are highest when air-fuel mixtures have less oxygen than required for complete combustion. These emissions occur especially in vehicle idle, low speed, and cold start conditions. Methane and NMVOC emissions from motor vehicles are a function of the CH₄ content of the motor fuel, the amount of hydrocarbons passing uncombusted through the engine, and any post-combustion control of hydrocarbon emissions (such as catalytic converters).

An alternative method of presenting combustion emissions is to allocate emissions associated with electric power to the sectors in which it is used. Four end-use sectors are defined: transportation, industrial, residential, and commercial. In Table 3-11 below, electric power emissions have been distributed to each end-use sector based upon the sector's share of national electricity use, with the exception of CH₄ and N₂O from transportation electricity use. 12 Emissions from U.S. Territories are also calculated separately due to a lack of end-use-specific consumption data. 13 This method assumes that emissions from combustion sources are distributed across the four end-use sectors based on the ratio of electricity use in that sector. The results of this alternative method are presented in Table 3-11.

Table 3-11: CO₂, CH₄, and N₂O Emissions from Fossil Fuel Combustion by End-Use Sector with Electricity Emissions Distributed (MMT CO₂ Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	1,517.6	1,904.7	1,805.9	1,838.1	1,843.1	1,595.3	1,776.7
CO ₂	1,472.0	1,863.3	1,784.4	1,817.7	1,821.2	1,576.6	1,757.4
CH ₄	7.2	4.4	2.9	2.9	2.9	2.6	2.6
N_2O	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Industrial	1,550.7	1,600.2	1,304.2	1,325.5	1,291.1	1,186.8	1,230.3
CO ₂	1,538.9	1,587.1	1,293.4	1,314.9	1,281.4	1,177.7	1,220.7
CH ₄	2.2	2.2	2.1	2.1	2.1	2.0	2.0
N_2O	9.6	10.8	8.7	8.5	7.6	7.1	7.6
Residential	944.2	1,230.1	923.8	994.9	938.6	870.8	898.5
CO ₂	931.3	1,214.9	910.5	980.5	925.1	858.5	885.6
CH ₄	6.0	4.9	4.7	5.6	5.8	4.9	5.1
N_2O	6.9	10.3	8.5	8.8	7.7	7.4	7.8
Commercial	773.1	1,040.9	848.0	860.5	812.0	716.8	760.1
CO ₂	766.0	1,030.1	838.2	850.9	803.4	708.8	751.6
CH ₄	1.3	1.5	1.8	1.8	1.9	1.8	1.8
N_2O	5.7	9.3	8.0	7.8	6.8	6.2	6.7
U.S. Territories ^a	20.1	52.1	26.0	26.0	24.9	23.4	23.9
Total	4,805.7	5,828.0	4,907.9	5,045.0	4,909.8	4,393.0	4,689.4

^a U.S. Territories are not apportioned by sector, and emissions are total greenhouse gas emissions from all fuel combustion sources.

3-16 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

¹² Separate calculations are performed for transportation-related CH₄ and N₂O. The methodology used to calculate these emissions is discussed in the Mobile Combustion section.

¹³ U.S. Territories (including American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other outlying U.S. Pacific Islands) consumption data obtained from EIA are only available at the aggregate level and cannot be broken out by enduse sector. The distribution of emissions to each end-use sector for the 50 states does not apply to territories data.

Notes: Totals may not sum due to independent rounding. Emissions from fossil fuel combustion by electric power are allocated based on aggregate national electricity use by each end-use sector.

Electric Power Sector

The process of generating electricity is the largest stationary source of CO_2 emissions in the United States, representing 28.6 percent of total CO_2 emissions from all CO_2 emissions sources across the United States. Methane and N_2O accounted for a small portion of total greenhouse gas emissions from electric power, representing 0.1 percent and 1.2 percent, respectively. Electric power also accounted for 33.2 percent of CO_2 emissions from fossil fuel combustion in 2021. Methane and N_2O from electric power represented 12.1 and 48.7 percent of total CH_4 and CO_2 emissions from fossil fuel combustion in 2021, respectively.

For the underlying energy data used in this chapter, the Energy Information Administration (EIA) places electric power generation into three functional categories: the electric power sector, the commercial sector, and the industrial sector. The energy use and emissions associated with the electric power sector are included here. The electric power sector consists of electric utilities and independent power producers whose primary business is the production of electricity. This includes both regulated utilities and non-utilities (e.g., independent power producers, qualifying co-generators, and other small power producers). Energy use and emissions associated with electric generation in the commercial and industrial sectors is reported in those other sectors where the producer of the power indicates that its primary business is something other than the production of electricity. ¹⁴

Total greenhouse gas emissions from the electric power sector have decreased by 15.1 percent since 1990. From 1990 to 2007, electric power sector emissions increased by 33 percent, driven by a significant increase in electricity demand (39 percent) while the carbon intensity of electricity generated showed a modest decline (3.2 percent). From 2008 to 2021, as electricity demand increased by 1.9 percent, electric power sector emissions decreased by 35 percent, driven by a significant drop (22 percent) in the carbon intensity of electricity generated. Overall, the carbon intensity of the electric power sector, in terms of CO_2 Eq. per QBtu, decreased by 25 percent from 1990 to 2020 with additional trends detailed in Box 3-4. This decoupling of electric power generation and the resulting CO_2 emissions is shown in Figure 3-9. This recent decarbonization of the electric power sector is a result of several key drivers.

Coal-fired electric generation (in kilowatt-hours [kWh]) decreased from 54 percent of generation in 1990 to 23 percent in 2021. ¹⁵ This corresponded with an increase in natural gas generation and renewable energy generation, largely from wind and solar energy. Natural gas generation (in kWh) represented 11 percent of electric power generation in 1990 and increased over the 32-year period to represent 37 percent of electric power sector generation in 2021 (see Table 3-12). Natural gas has a much lower carbon content than coal and is generated in power plants that are generally more efficient in terms of kWh produced per Btu of fuel combusted, which has led to lower emissions as natural gas replaces coal-powered electricity generation. Natural gas and coal used in the United States in 2021 had an average carbon content of 14.43 MMT C/QBtu and 26.13 MMT C/QBtu respectively.

Table 3-12: Electric Power Generation by Fuel Type (Percent)

Fuel Type	1990	2005	2017	2018	2019	2020	2021
Coal	54.1%	51.1%	30.9%	28.4%	24.2%	19.9%	22.6%
Natural Gas	10.7%	17.5%	30.9%	34.0%	37.3%	39.5%	37.3%
Nuclear	19.9%	20.0%	20.8%	20.1%	20.4%	20.5%	19.7%
Renewables	11.3%	8.3%	16.8%	16.8%	17.6%	19.5%	19.9%
Petroleum	4.1%	3.0%	0.5%	0.6%	0.4%	0.4%	0.5%

¹⁴ Utilities primarily generate power for the U.S. electric grid for sale to retail customers. Non-utilities typically generate electricity for sale on the wholesale electricity market (e.g., to utilities for distribution and resale to retail customers). Where electricity generation occurs outside the EIA-defined electric power sector, it is typically for the entity's own use.

¹⁵ Values represent electricity *net* generation from the electric power sector (EIA 2023a).

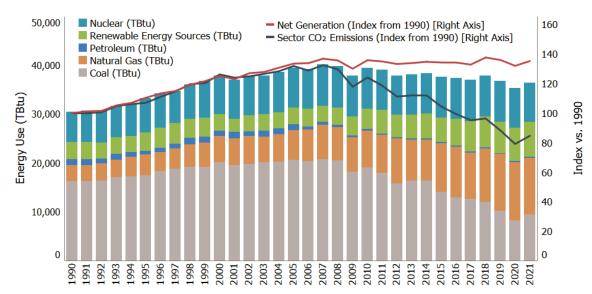
Other Gases ^a	0.0%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%
Net Electricity Generation							
(Billion kWh) ^b	2,905	3,902	3,878	4,020	3,966	3,851	3,954

⁺ Does not exceed 0.05 percent.

In 2021, CO_2 emissions from the electric power sector increased by 7.0 percent relative to 2020. This increase in CO_2 emissions was primarily driven by an increase in coal consumed to produce electricity in the electric power sector. Consumption of coal for electric power increased by 15.4 percent while consumption of natural gas decreased 3.5 percent from 2020 to 2021, leading to an overall increase in emissions. There has also been a rapid increase in renewable energy electricity generation in the electric power sector in recent years. Electricity generation from renewable sources increased by 4 percent from 2020 to 2021 (see Table 3-12). A decrease in coal-powered electricity generation and increase in natural gas and renewable energy electricity generation contributed to a decoupling of emissions trends from electric power generation trends over the recent time series (see Figure 3-9).

Decreases in natural gas prices and the associated increase in natural gas generation, particularly between 2005 and 2021, was one of the main drivers of the recent fuel switching and decrease in electric power sector carbon intensity. During this time period, the cost of natural gas (in \$/MMBtu) decreased by 22 percent while the cost of coal (in \$/MMBtu) increased by 71 percent (EIA 2022a). Also, between 1990 and 2021, renewable energy generation (in kWh) from wind and solar energy increased from 0.1 percent of total generation in 1990 to 12 percent in 2021, which also helped drive the decrease in electric power sector carbon intensity. This decrease in carbon intensity occurred even as total electricity retail sales increased 40 percent, from 2,713 billion kWh in 1990 to 3,806 billion kWh in 2021.

Figure 3-9: Fuels Used in Electric Power Generation and Total Electric Power Sector CO₂ Emissions



Electricity was used primarily in the residential, commercial, and industrial end-use sectors for lighting, heating, electric motors, appliances, electronics, and air conditioning (see Figure 3-10). Note that transportation is an end-use sector as well but is not shown in Figure 3-10 due to the sector's relatively low percentage of electricity use. Table 3-13 provides a break-out of CO₂ emissions from electricity use in the transportation end-use sector.

^a Other gases include blast furnace gas, propane gas, and other manufactured and waste gases derived from fossil fuels.

^b Represents net electricity generation from the electric power sector. Excludes net electricity generation from commercial and industrial combined-heat-and-power and electricity-only plants. Does not include electricity generation from purchased steam as the fuel used to generate the steam cannot be determined.

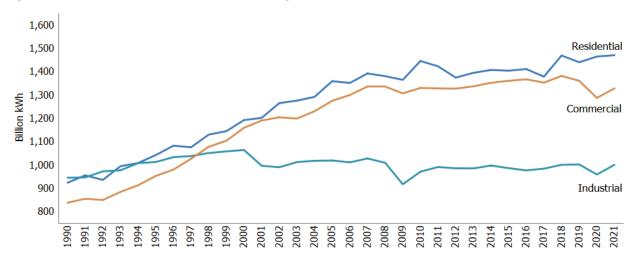


Figure 3-10: Electric Power Retail Sales by End-Use Sector

In 2021, electricity sales to the residential and commercial end-use sectors, as presented in Figure 3-10, increased by 0.4 percent and 3.2 percent relative to 2020, respectively. Electricity sales to the industrial sector in 2021 increased by approximately 4.3 percent relative to 2020. The sections below describe end-use sector energy use in more detail. Overall, in 2021, the amount of electricity retail sales (in kWh) increased by 2.4 percent relative to 2020.

Industrial Sector

Industrial sector CO_2 , CH_4 , and N_2O emissions accounted for 17, 14, and 5 percent of CO_2 , CH_4 , and N_2O emissions from fossil fuel combustion, respectively in 2021. Carbon dioxide, CH_4 , and N_2O emissions resulted from the direct consumption of fossil fuels for steam and process heat production.

The industrial end-use sector, per the underlying energy use data from EIA, includes activities such as manufacturing, construction, mining, and agriculture. The largest of these activities in terms of energy use is manufacturing, of which six industries—Petroleum Refineries, Chemicals, Paper, Primary Metals, Food, and Nonmetallic Mineral Products—represent the majority of the energy use (EIA 2022a; EIA 2009b).

There are many dynamics that impact emissions from the industrial sector including economic activity, changes in the make-up of the industrial sector, changes in the emissions intensity of industrial processes, and weather-related impacts on heating and cooling of industrial buildings. ¹⁶ Structural changes within the U.S. economy that lead to shifts in industrial output away from energy-intensive manufacturing products to less energy-intensive products (e.g., from steel to computer equipment) have had a significant effect on industrial emissions.

From 2020 to 2021, total industrial production and manufacturing output increased by 4.9 percent (FRB 2022). Over this period, output increased slightly across production indices for Food, Nonmetallic Mineral Products, Paper, Petroleum Refineries, and Primary Metals. Production of chemicals declined slightly between 2020 and 2021 (see Figure 3-11). From 2020 to 2021, total energy use in the industrial sector increased by 1.6 percent, driven mainly by a 2.8 percent increase in the consumption of renewables, while energy use from fossil fuels in the industrial sector increased by 1.4 percent. Due to the relative increases and decreases of individual indices there was an increase in natural gas and an increase in electricity used by the sector (see Figure 3-12). In 2021, CO₂, CH₄,

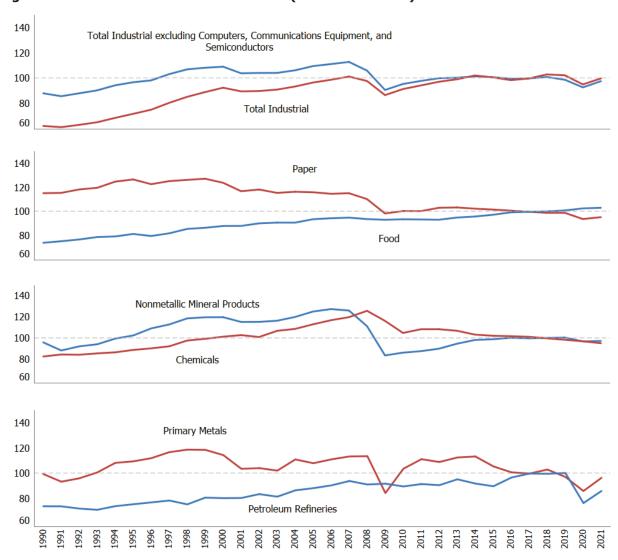
Energy 3-19

¹⁶ Some commercial customers are large enough to obtain an industrial price for natural gas and/or electricity and are consequently grouped with the industrial end-use sector in U.S. energy statistics. These misclassifications of large commercial customers likely cause the industrial end-use sector to appear to be more sensitive to weather conditions.

and N_2O emissions from fossil fuel combustion and electricity use within the industrial end-use sector totaled 1,230.3 MMT CO_2 Eq., a 3.7 percent increase from 2020 emissions.

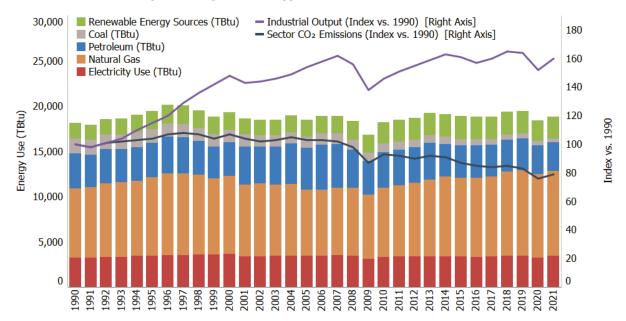
Through EPA's Greenhouse Gas Reporting Program (GHGRP), specific industrial sector trends can be discerned from the overall total EIA industrial fuel consumption data used for these calculations. For example, from 2020 to 2021, the underlying EIA data showed increased consumption of coal and natural gas and decreased consumption of petroleum in the industrial sector. The GHGRP data highlights that several industries contributed to these trends, including chemical manufacturing; pulp, paper and print; food processing, beverages and tobacco; minerals manufacturing; and agriculture-forest-fisheries. ¹⁷

Figure 3-11: Industrial Production Indices (Index 2017=100)



¹⁷ Further details on industrial sector combustion emissions are provided by EPA's GHGRP. See http://ghgdata.epa.gov/ghgp/main.do.

Figure 3-12: Fuels and Electricity Used in Industrial Sector, Industrial Output, and Total Sector CO₂ Emissions (Including Electricity)



Despite the growth in industrial output (60 percent) and the overall U.S. economy (109 percent) from 1990 to 2021, direct CO_2 emissions from fossil fuel combustion in the industrial sector decreased by 9.0 percent over the same time series. A number of factors are assumed to result in decoupling of growth in industrial output from industrial greenhouse gas emissions, for example: (1) more rapid growth in output from less energy-intensive industries relative to traditional manufacturing industries, and (2) energy-intensive industries such as steel are employing new methods, such as electric arc furnaces, that are less carbon intensive than the older methods.

Box 3-3: Uses of Greenhouse Gas Reporting Program Data and Improvements in Reporting Emissions from Industrial Sector Fossil Fuel Combustion

As described in the calculation methodology, total fossil fuel consumption for each year is based on aggregated end-use sector consumption published by the EIA. The availability of facility-level combustion emissions through EPA's GHGRP has provided an opportunity to better characterize the industrial sector's energy consumption and emissions in the United States, through a disaggregation of EIA's industrial sector fuel consumption data from select industries.

For GHGRP 2010 through 2021 reporting years, facility-level fossil fuel combustion emissions reported through EPA's GHGRP were categorized and distributed to specific industry types by utilizing facility-reported NAICS codes (as published by the U.S. Census Bureau). As noted previously in this report, the definitions and provisions for reporting fuel types in EPA's GHGRP include some differences from the Inventory's use of EIA national fuel statistics to meet the UNFCCC reporting guidelines. The IPCC has provided guidance on aligning facility-level reported fuels and fuel types published in national energy statistics, which guided this exercise. ¹⁸

As with previous Inventory reports, the current effort represents an attempt to align, reconcile, and coordinate the facility-level reporting of fossil fuel combustion emissions under EPA's GHGRP with the national-level approach presented in this report. Consistent with recommendations for reporting the Inventory to the UNFCCC, progress was made on certain fuel types for specific industries and has been included in the CRF tables

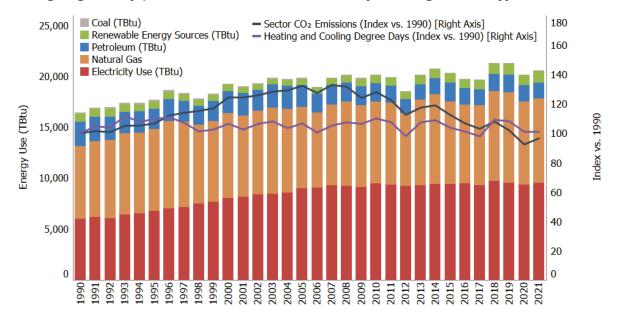
¹⁸ See Section 4 "Use of Facility-Level Data in Good Practice National Greenhouse Gas Inventories" of the IPCC meeting report, and specifically the section on using facility-level data in conjunction with energy data, at http://www.ipcc-nggip.iges.or.ip/public/tb/TFI Technical Bulletin 1.pdf.

that are submitted to the UNFCCC along with this report. 19 The efforts in reconciling fuels focus on standard, common fuel types (e.g., natural gas, distillate fuel oil) where the fuels in EIA's national statistics aligned well with facility-level GHGRP data. For these reasons, the current information presented in the Common Reporting Format (CRF) tables should be viewed as an initial attempt at this exercise. Additional efforts will be made for future Inventory reports to improve the mapping of fuel types and examine ways to reconcile and coordinate any differences between facility-level data and national statistics. The current analysis includes the full time series presented in the CRF tables. Analyses were conducted linking GHGRP facility-level reporting with the information published by EIA in its MECS data in order to disaggregate the full 1990 through 2021 time period in the CRF tables. It is believed that the current analysis has led to improvements in the presentation of data in the Inventory, but further work will be conducted, and future improvements will be realized in subsequent Inventory reports. This includes incorporating the latest MECS data as it becomes available.

Residential and Commercial Sectors

Emissions from the residential and commercial sectors have generally decreased since 2005. Short-term trends are often correlated with seasonal fluctuations in energy use caused by weather conditions, rather than prevailing economic conditions. Population growth and a trend towards larger houses has led to increasing energy use over the time series, while population migration to warmer areas and improved energy efficiency and building insulation have slowed the increase in energy use in recent years. Starting in around 2014, energy use and emissions begin to decouple due to decarbonization of the electric power sector (see Figure 3-13).

Figure 3-13: Fuels and Electricity Used in Residential and Commercial Sectors, Heating and Cooling Degree Days, and Total Sector CO₂ Emissions (Including Electricity)



In 2021 the residential and commercial sectors accounted for 7 and 5 percent of CO₂ emissions from fossil fuel combustion, respectively; 40 and 11 percent of CH₄ emissions from fossil fuel combustion, respectively; and 2 and 1 percent of N₂O emissions from fossil fuel combustion, respectively. Emissions from these sectors were largely due to the direct consumption of natural gas and petroleum products, primarily for heating and cooking needs. Coal consumption was a minor component of energy use in the commercial sector and did not contribute to any

3-22 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

¹⁹ See https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

energy use in the residential sector. In 2021, total emissions (CO₂, CH₄, and N₂O) from fossil fuel combustion and electricity use within the residential and commercial end-use sectors were 898.5 MMT CO₂ Eq. and 760.1 MMT CO₂ Eq., respectively. Total CO₂, CH₄, and N₂O emissions from combined fossil fuel combustion and electricity use within the residential and commercial end-use sectors increased by 3.2 and 6.0 percent from 2020 to 2021, respectively. An increase in heating degree days (0.5 percent) increased energy demand for heating in the residential and commercial sectors. This was partially offset by a 1.8 percent decrease in cooling degree days compared to 2020, which impacted demand for air conditioning in the residential and commercial sectors. This resulted in a 0.4 percent increase in residential sector electricity use. From 2020 to 2021 there was a 2.4 percent higher direct energy use in the commercial sector. In addition, a shift toward energy efficient products and more stringent energy efficiency standards for household equipment has contributed to a decrease in energy demand in households (EIA 2022d), resulting in a decrease in energy-related emissions. In the long term, the residential sector is also affected by population growth, migration trends toward warmer areas, and changes in total housing units and building attributes (e.g., larger sizes and improved insulation).

In 2021, combustion emissions from natural gas consumption represented 83 and 78 percent of the direct fossil fuel CO_2 emissions from the residential and commercial sectors, respectively. Carbon dioxide emissions from natural gas combustion in the residential and commercial sectors in 2021 increased by 0.9 percent and increased by 4.0 percent from 2020, respectively.

U.S. Territories

Emissions from U.S. Territories are based on the fuel consumption in American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other outlying U.S. Pacific Islands. As described in the Methodology section of CO₂ from Fossil Fuel Combustion, this data is collected separately from the sectoral-level data available for the general calculations. As sectoral information is not available for U.S. Territories, CO₂, CH₄, and N₂O emissions are not presented for U.S. Territories in the tables above by sector, though the emissions will occur across all sectors and sources including stationary, transportation and mobile combustion sources.

Transportation Sector and Mobile Combustion

This discussion of transportation emissions follows the alternative method of presenting combustion emissions by allocating emissions associated with electricity generation to the transportation end-use sector, as presented in Table 3-11. Table 3-10 presents direct CO₂, CH₄, and N₂O emissions from all transportation sources (i.e., excluding emissions allocated to electricity consumption in the transportation end-use sector).

The transportation end-use sector and other mobile combustion accounted for 1,776.8 MMT CO_2 Eq. in 2021, which represented 36 percent of CO_2 emissions, 23 percent of CH_4 emissions, and 43 percent of N_2O emissions from fossil fuel combustion, respectively. ²⁰ Fuel purchased in the United States for international aircraft and marine travel accounted for an additional 80.9 MMT CO_2 Eq. in 2021; these emissions are recorded as international bunkers and are not included in U.S. totals according to UNFCCC reporting protocols.

Transportation End-Use Sector

From 1990 to 2019, transportation emissions from fossil fuel combustion rose by 21 percent, followed by a 13 percent reduction from 2019 to 2020. Emissions then increased 11 percent from 2020 to 2021. Overall, from 1990 to 2021, transportation emissions from fossil fuel combustion increased by 17 percent. The increase in transportation emissions from fossil fuel combustion from 1990 to 2021 was due, in large part, to increased demand for travel (see Figure 3-14). The number of vehicle miles traveled (VMT) by light-duty motor vehicles (passenger cars and light-duty trucks) increased 44 percent from 1990 to 2021, as a result of a confluence of factors including population growth, economic growth, urban sprawl, and periods of low fuel prices. Between 2019 and 2020, emissions from light-duty vehicles fell by 11 percent, primarily the result of the COVID-19 pandemic and

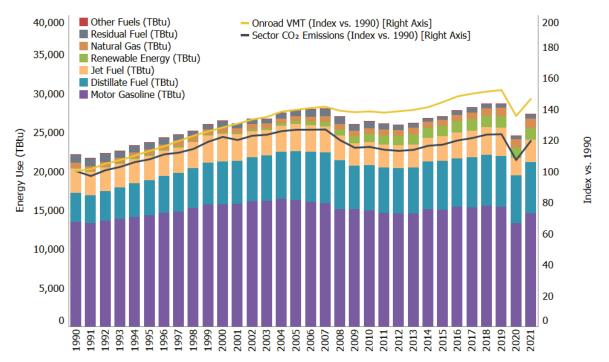
 $^{^{20}}$ Note that these totals include CO_2 , CH_4 and N_2O emissions from some sources in the U.S. Territories (ships and boats, recreational boats, non-transportation mobile sources) and CH_4 and N_2O emissions from transportation rail electricity.

associated restrictions, such as people working from home and traveling less. Light-duty vehicle VMT rebounded in 2021 but is still estimated to be 4 percent below 2019 levels.

Commercial aircraft emissions decreased by 13 percent between 2019 and 2021, and have decreased 15 percent since 2007 (FAA 2022 and DOT 1991 through 2021). Decreases in jet fuel emissions (excluding bunkers) started in 2007 due in part to improved operational efficiency that results in more direct flight routing, improvements in aircraft and engine technologies to reduce fuel burn and emissions, and the accelerated retirement of older, less fuel-efficient aircraft; however, the sharp decline in commercial aircraft emissions from 2019 to 2021 is primarily due to COVID-19 impacts on scheduled passenger air travel.

Almost all of the energy consumed for transportation was supplied by petroleum-based products, with more than half being related to gasoline consumption in automobiles and other highway vehicles. Other fuel uses, especially diesel fuel for freight trucks and jet fuel for aircraft, accounted for the remainder. The primary driver of transportation-related emissions was CO₂ from fossil fuel combustion, which increased by 19 percent from 1990 to 2021. Annex 3.2 presents the total emissions from all transportation and mobile sources, including CO₂, N₂O, CH₄, and HFCs.

Figure 3-14: Fuels Used in Transportation Sector, On-road VMT, and Total Sector CO₂ Emissions



Notes: Distillate fuel, residual fuel, and jet fuel include adjustments for international bunker fuels. Distillate fuel and motor gasoline include adjustments for the sectoral allocation of these fuels. Other Fuels includes aviation gasoline and propane. Source: Information on fuel consumption was obtained from EIA (2022).

Transportation Fossil Fuel Combustion CO2 Emissions

Domestic transportation CO₂ emissions increased by 19 percent (285.5 MMT CO₂) between 1990 and 2021, an annualized increase of 0.6 percent. This includes a 24 percent increase in CO₂ emissions between 1990 and 2019, followed by a 13 percent decrease between 2019 and 2020. Carbon dioxide emissions then increased by 11 percent between 2020 and 2021. Among domestic transportation sources in 2021, light-duty vehicles (including

_

²¹ Commercial aircraft consists of passenger aircraft, cargo, and other chartered flights.

passenger cars and light-duty trucks) represented 58 percent of CO₂ emissions from fossil fuel combustion, medium- and heavy-duty trucks and buses 25 percent, commercial aircraft 7 percent, and other sources 11 percent. See Table 3-13 for a detailed breakdown of transportation CO₂ emissions by mode and fuel type.

Almost all of the energy consumed by the transportation sector is petroleum-based, including motor gasoline, diesel fuel, jet fuel, and residual oil. Carbon dioxide emissions from the combustion of ethanol and biodiesel for transportation purposes, along with the emissions associated with the agricultural and industrial processes involved in the production of biofuel, are captured in other Inventory sectors. ²² Ethanol consumption by the transportation sector has increased from 0.7 billion gallons in 1990 to 13.0 billion gallons in 2021, while biodiesel consumption has increased from 0.01 billion gallons in 2001 to 1.7 billion gallons in 2021. For additional information, see Section 3.11 on biofuel consumption at the end of this chapter and Table A-76 in Annex 3.2.

Carbon dioxide emissions from passenger cars and light-duty trucks totaled 1,019.0 MMT CO2 in 2021, an increase of 11 percent (104.6 MMT CO₂) from 1990. The increase in CO₂ emissions from passenger cars and light-duty trucks from 1990 to 2021 was due, in large part, to increased demand for travel as fleet-wide light-duty vehicle fuel economy was relatively stable (average new vehicle fuel economy declined slowly from 1990 through 2004 and then increased more rapidly from 2005 through 2021). Carbon dioxide emissions from passenger cars and lightduty trucks peaked at 1,145.7 MMT in 2004, and since then have declined about 11 percent. The decline in new light-duty vehicle fuel economy between 1990 and 2004 (Figure 3-15) reflects the increasing market share of lightduty trucks, which grew from about 30 percent of new vehicle sales in 1990 to 48 percent in 2004. Starting in 2005, average new vehicle fuel economy began to increase while light-duty vehicle VMT grew only modestly for much of the period. Light-duty vehicle VMT grew by less than one percent or declined each year between 2005 and 2013, and again between 2017 and 2019.²³ VMT grew at faster rates of 2.6 percent from 2014 to 2015 and 2.5 percent from 2015 to 2016. From 2019 to 2020, light-duty vehicle VMT declined by 11 percent due to the COVID-19 pandemic; from 2020 to 2021 light-duty vehicle VMT rebounded, increasing by 8.1 percent.

Average new vehicle fuel economy has increased almost every year since 2005, while the light-duty truck share of new vehicle sales decreased to about 33 percent in 2009 and has since varied from year to year between 36 and 63 percent. Since 2014, the light-duty truck share has steadily increased, reaching 63 percent of new vehicles sales in model year 2021 (EPA 2022b). See Annex 3.2 for data by vehicle mode and information on VMT and the share of new vehicles (in VMT).

Medium- and heavy-duty truck CO₂ emissions increased by 75 percent from 1990 to 2021. This increase was largely due to a substantial growth in medium- and heavy-duty truck VMT, which increased by 66 percent between 1990 and 2021.

Carbon dioxide emissions from the domestic operation of commercial aircraft decreased by 8 percent (9.1 MMT CO₂) from 1990 to 2021. Across all categories of aviation, excluding international bunkers, CO₂ emissions decreased by 18 percent (33 MMT CO₂) between 1990 and 2021.²⁴ Emissions from military aircraft decreased 65 percent between 1990 and 2021. Commercial aircraft emissions increased 27 percent between 1990 and 2007, dropped 2 percent from 2007 to 2019, dropped another 33 percent from 2019 to 2020, followed by an increase of

Energy 3-25

²² Biofuel estimates are presented in the Energy chapter for informational purposes only, in line with IPCC methodological guidance and UNFCCC reporting obligations. Net carbon fluxes from changes in biogenic carbon reservoirs in croplands are accounted for in the estimates for Land Use, Land-Use Change, and Forestry (see Chapter 6). More information and additional analyses on biofuels are available at EPA's Renewable Fuels Standards website. See https://www.epa.gov/renewable-fuelstandard-program.

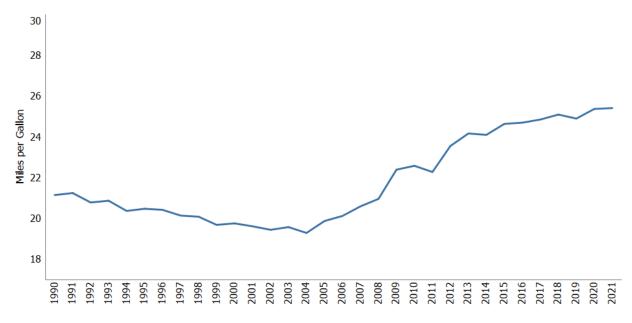
²³ VMT estimates are based on data from FHWA Highway Statistics Table VM-1 (FHWA 1996 through 2023). VMT estimates from FHWA are allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model).

²⁴ Includes consumption of jet fuel and aviation gasoline. Does not include aircraft bunkers, which are not included in national emission totals, in line with IPCC methodological guidance and UNFCCC reporting obligations.

23 percent from 2020 to 2021. Overall, this represents a change of approximately 8 percent between 1990 and 2021.

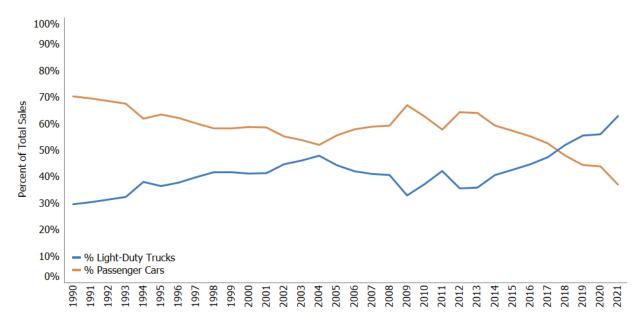
Transportation sources also produce CH_4 and N_2O ; these emissions are included in Figure 3-14 and Table 3-15 and in the CH_4 and N_2O from Mobile Combustion section. Annex 3.2 presents total emissions from all transportation and mobile sources, including CO_2 , CH_4 , N_2O , and HFCs.

Figure 3-15: Sales-Weighted Fuel Economy of New Passenger Cars and Light-Duty Trucks, 1990–2021



Source: EPA (2022a).

Figure 3-16: Sales of New Passenger Cars and Light-Duty Trucks, 1990–2021



Source: EPA (2022b).

Table 3-13: CO_2 Emissions from Fossil Fuel Combustion in Transportation End-Use Sector (MMT CO_2 Eq.)

Fuel/Vehicle Type	1990	2005	2017	2018	2019	2020	2021
Gasolinea	958.9	1,150.1	1,081.8	1,097.0	1,086.5	937.0	1,028.7
Passenger Cars	612.8	518.9	375.2	382.5	380.0	328.0	360.5
Light-Duty Trucks	283.6	583.4	661.5	667.6	658.6	565.7	619.9
Medium- and Heavy-Duty							
Trucks ^b	42.8	28.1	24.9	26.2	27.0	24.1	27.4
Buses	2.1	1.1	2.5	2.7	2.8	2.5	2.9
Motorcycles	3.4	4.9	7.0	7.3	7.4	6.6	7.4
Recreational Boats ^c	14.3	13.7	10.6	10.7	10.7	10.1	10.6
Distillate Fuel Oil (Diesel) ^a	262.9	462.6	465.9	476.6	474.0	447.2	480.4
Passenger Cars	9.4	2.2	3.0	2.8	2.7	2.5	2.7
Light-Duty Trucks	8.4	30.4	31.1	31.2	31.2	30.2	33.3
Medium- and Heavy-Duty							
Trucks ^b	189.0	357.2	362.0	371.5	373.0	353.4	380.1
Buses	11.1	15.5	19.7	20.4	20.7	19.8	21.4
Rail	35.5	46.1	37.4	38.5	36.0	31.0	32.2
Recreational Boats ^c	2.7	2.9	2.8	2.8	2.9	2.7	2.8
Ships and Non-Recreational							
Boats ^d	6.8	8.4	10.0	9.3	7.5	7.6	7.8
International Bunker Fuels ^e	11.7	9.5	9.0	10.0	10.1	7.8	7.4
Jet Fuel	184.1	189.2	171.7	172.3	180.3	120.6	152.6
Commercial Aircraft ^f	109.9	132.7	128.0	129.6	136.7	91.3	119.0
Military Aircraft	35.7	19.8	12.5	12.1	12.2	11.7	12.5
General Aviation Aircraft	38.5	36.8	31.2	30.6	31.4	17.6	21.1
International Bunker Fuels ^e	38.2	60.2	77.8	80.9	78.3	39.8	50.8
International Bunker Fuels							
from Commercial Aviation	30.0	55.6	74.5	79.8	75.1	36.7	47.6
Aviation Gasoline	3.1	2.4	1.4	1.5	1.6	1.4	1.5
General Aviation Aircraft	3.1	2.4	1.4	1.5	1.6	1.4	1.5
Residual Fuel Oil	22.6	19.3	16.5	14.0	14.5	7.3	23.9
Ships and Non-Recreational							
Boatse	22.6	19.3	16.5	14.0	14.5	7.3	23.9
International Bunker Fuels ^e	53.7	43.6	33.4	31.4	25.2	22.1	21.9
Natural Gas ¹	36.0	33.1	42.3	50.9	58.9	58.7	65.1
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	+	+	+	+	+	+	+
Medium- and Heavy-Duty		·	·	·	·	·	,
Trucks	+	0.1	0.1	0.1	0.1	0.1	0.1
Buses	+	0.3	0.5	0.6	0.6	0.6	0.7
Pipelineg	36.0	32.6	41.6	50.2	58.2	57.9	64.2
LPG [†]	1.4	1.8	0.6	0.6	0.5	0.3	0.3
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	0.2	0.3	+	0.1	0.1	+	0.1
Medium- and Heavy-Duty	0.2	0.5		0.1	0.1	'	0.1
Trucks ^b	1.1	1.1	0.4	0.4	0.4	0.2	0.2
Buses	0.2	0.3	0.4	0.4	0.4	+	+
		4.7	4.3			4.1	5.0
Electricity ^k	3.0			4.8 1.2	4.8		
Passenger Cars	+	+	0.8		1.4	1.3	1.8
Light-Duty Trucks	+	+	0.1	0.2	0.2	0.3	0.7
Buses	+	+	+	+	+	0.1	0.1
Rail	3.0	4.7	3.4	3.4	3.1	2.4	2.5

Total ^{e,j}	1,472.0	1,863.3	1,784.4	1,817.7	1,821.2	1,576.6	1,757.4
International Bunker Fuels	104.6	114.3	121.2	125.3	114.6	70.3	80.9
Biofuels-Ethanol ^h	4.1	21.6	77.7	78.6	78.7	68.1	75.4
Biofuels-Biodiesel ^h	+	0.9	18.7	17.9	17.1	17.7	16.1

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Case 5:23-cv-00304-H

- ^e Official estimates exclude emissions from the combustion of both aviation and marine international bunker fuels; however, estimates of international bunker fuel-related emissions are presented for informational purposes.
- ^f Commercial aircraft, as modeled in FAA's Aviation Environmental Design Tool (AEDT), consists of passenger aircraft, cargo, and other chartered flights.
- g Pipelines reflect CO₂ emissions from natural gas-powered pipelines transporting natural gas.
- ^h Ethanol and biodiesel estimates are presented for informational purposes only. See Section 3.10 of this chapter and the estimates in Land Use, Land-Use Change, and Forestry (see Chapter 6), in line with IPCC methodological guidance and UNFCCC reporting obligations, for more information on ethanol and biodiesel.
- Transportation sector natural gas and LPG consumption are based on data from EIA (2021b). Prior to the 1990 to 2015 Inventory, data from DOE TEDB were used to estimate each vehicle class's share of the total natural gas and LPG consumption. Since TEDB does not include estimates for natural gas use by medium and heavy-duty trucks or LPG use by passenger cars, EIA Alternative Fuel Vehicle Data (Browning 2017) is now used to determine each vehicle class's share of the total natural gas and LPG consumption. These changes were first incorporated in the 1990 to 2016 Inventory and apply to the 1990 to 2021 time period.
- ^j Includes emissions from rail electricity.
- ^k Electricity consumption by passenger cars, light-duty trucks (SUVs), and buses is based on plug-in electric vehicle sales and engine efficiency data, as outlined in Browning (2018a). In prior Inventory years, CO₂ emissions from electric vehicle charging were allocated to the residential and commercial sectors. They are now allocated to the transportation sector. These changes apply to the 2010 through 2021 time period.

Notes: This table does not include emissions from non-transportation mobile sources, such as agricultural equipment and construction/mining equipment; it also does not include emissions associated with electricity consumption by pipelines or lubricants used in transportation. In addition, this table does not include CO₂ emissions from U.S. Territories, since these are covered in a separate chapter of the Inventory. Totals may not sum due to independent rounding.

Mobile Fossil Fuel Combustion CH₄ and N₂O Emissions

Mobile combustion includes emissions of CH_4 and N_2O from all transportation sources identified in the U.S. Inventory with the exception of pipelines and electric locomotives; 25 mobile sources also include non-transportation sources such as construction/mining equipment, agricultural equipment, vehicles used off-road, and other sources (e.g., snowmobiles, lawnmowers, etc.). 26 Annex 3.2 includes a summary of all emissions from

^a On-road fuel consumption data from FHWA Table MF-21 and MF-27 were used to determine total on-road use of motor gasoline and diesel fuel (FHWA 1996 through 2023). Ratios developed from MOVES3 output are used to apportion FHWA fuel consumption data to vehicle type and fuel type (see Annex 3.2 for information about the MOVES model).

^b Includes medium- and heavy-duty trucks over 8,500 lbs.

^c In 2014, EPA incorporated the NONROAD2008 model into the MOVES model framework. The current Inventory uses the Nonroad component of MOVES3 for years 1999 through 2021. See Annex 3.2 for information about the MOVES model.

^d Note that large year over year fluctuations in emission estimates partially reflect nature of data collection for these sources.

²⁵ Emissions of CH₄ from natural gas systems are reported separately. More information on the methodology used to calculate these emissions are included in this chapter and Annex 3.4.

 $^{^{26}}$ See the methodology sub-sections of the $\mathrm{CO_2}$ from Fossil Fuel Combustion and $\mathrm{CH_4}$ and $\mathrm{N_2O}$ from Mobile Combustion sections of this chapter. Note that $\mathrm{N_2O}$ and $\mathrm{CH_4}$ emissions are reported using different categories than $\mathrm{CO_2}$. $\mathrm{CO_2}$ emissions are reported by end-use sector (Transportation, Industrial, Commercial, Residential, U.S. Territories), and generally adhere to a top-down approach to estimating emissions. $\mathrm{CO_2}$ emissions from non-transportation sources (e.g., lawn and garden equipment, farm equipment, construction equipment) are allocated to their respective end-use sector (i.e., construction equipment $\mathrm{CO_2}$ emissions are included in the Industrial end-use sector instead of the Transportation end-use sector). $\mathrm{CH_4}$ and $\mathrm{N_2O}$ emissions are reported using the "Mobile Combustion" category, which includes non-transportation mobile sources. $\mathrm{CH_4}$ and $\mathrm{N_2O}$ emission estimates are bottom-up estimates, based on total activity (fuel use, VMT) and emissions factors by source and technology type. These reporting schemes are in accordance with IPCC guidance. For informational purposes only, $\mathrm{CO_2}$ emissions from non-transportation mobile sources are presented separately from their overall end-use sector in Annex 3.2.

both transportation and mobile sources. Table 3-14 and Table 3-15 provide mobile fossil fuel CH_4 and N_2O emission estimates in MMT CO_2 Eq. 27

Mobile combustion was responsible for a small portion of national CH₄ emissions (0.4 percent) and was the fifth largest source of national N₂O emissions (4.2 percent). From 1990 to 2021, mobile source CH₄ emissions declined by 64 percent, to 2.6 MMT CO₂ Eq. (93 kt CH₄), due largely to emissions control technologies employed in on-road vehicles since the mid-1990s to reduce CO, NO_x, NMVOC, and CH₄ emissions. Mobile source emissions of N₂O decreased by 57 percent from 1990 to 2021, to 16.7 MMT CO₂ Eq. (63 kt N₂O). Earlier generation emissions control technologies initially resulted in higher N₂O emissions, causing a 31 percent increase in N₂O emissions from mobile sources between 1990 and 1997. Improvements in later-generation emissions control technologies have reduced N₂O emissions, resulting in a 67 percent decrease in mobile source N₂O emissions from 1997 to 2021 (Figure 3-17). Overall, CH₄ and N₂O emissions were predominantly from gasoline-fueled passenger cars, light-duty trucks and non-highway sources. See Annex 3.2 for data by vehicle mode and information on VMT and the share of new vehicles.



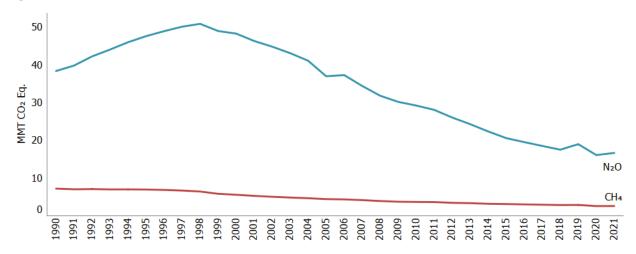


Table 3-14: CH₄ Emissions from Mobile Combustion (MMT CO₂ Eq.)

Fuel Type/Vehicle Type ^a	1990	2005	2017	2018	2019	2020	2021
Gasoline On-Road ^b	5.8	2.4	1.0	0.9	1.0	0.8	0.8
Passenger Cars	3.8	1.2	0.3	0.3	0.3	0.2	0.2
Light-Duty Trucks	1.5	1.0	0.6	0.5	0.6	0.5	0.5
Medium- and Heavy-Duty Trucks							
and Buses	0.5	0.1	+	+	+	+	+
Motorcycles	+	+	+	+	+	+	+
Diesel On-Road ^b	+	+	0.1	0.1	0.1	0.1	0.1
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	+	+	+	+	+	+	+
Medium- and Heavy-Duty Trucks	+	+	0.1	0.1	0.1	0.1	0.1
Medium- and Heavy-Duty Buses	+	+	+	+	+	+	+
Alternative Fuel On-Road	+	0.2	0.1	0.1	0.1	0.1	0.1
Non-Road ^c	1.4	1.8	1.7	1.8	1.7	1.6	1.6
Ships and Boats	0.4	0.5	0.5	0.5	0.4	0.4	0.5

²⁷ See Annex 3.2 for a complete time series of emission estimates for 1990 through 2021.

_

Total	7.2	4.4	3.0	2.9	2.9	2.6	2.6
Other ^g	0.5	0.7	0.8	0.8	0.8	0.8	0.7
Construction/Mining Equipment ^f	0.2	0.3	0.2	0.2	0.2	0.2	0.2
Agricultural Equipment ^e	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Aircraft	0.1	0.1	+	+	+	+	+
Rail ^d	0.1	0.1	0.1	0.1	0.1	0.1	0.1

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Table 3-15: N₂O Emissions from Mobile Combustion (MMT CO₂ Eq.)

Fuel Type/Vehicle Type ^a	1990	2005	2017	2018	2019	2020	2021
Gasoline On-Road ^b	32.0	28.5	8.4	7.0	8.1	6.4	6.0
Passenger Cars	22.4	13.3	2.9	2.5	2.5	2.0	1.9
Light-Duty Trucks	8.7	14.0	5.2	4.3	5.4	4.2	3.9
Medium- and Heavy-Duty Trucks							
and Buses	0.8	1.2	0.2	0.2	0.2	0.1	0.1
Motorcycles	+	+	0.1	0.1	0.1	0.1	0.1
Diesel On-Road ^b	0.2	0.4	2.8	3.0	3.2	3.0	3.3
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	+	+	0.2	0.3	0.2	0.2	0.3
Medium- and Heavy-Duty Trucks	0.2	0.3	2.5	2.7	2.9	2.7	2.7
Medium- and Heavy-Duty Buses	+	+	0.2	0.2	0.3	0.2	0.3
Alternative Fuel On-Road	+	+	+	+	+	+	+
Non-Road ^c	6.2	8.2	7.4	7.5	7.7	6.8	7.4
Ships and Boats	0.2	0.2	0.2	0.2	0.2	0.1	0.3
Rail ^d	0.2	0.4	0.3	0.3	0.3	0.2	0.3
Aircraft	1.5	1.6	1.4	1.4	1.5	1.0	1.3
Agricultural Equipment ^e	1.2	1.4	1.1	1.1	1.1	1.1	1.0
Construction/Mining Equipment ^f	1.2	1.9	1.6	1.6	1.7	1.6	1.7
Other ^g	1.8	2.8	2.8	2.9	2.9	2.8	2.9
Total	38.4	37.1	18.6	17.6	19.1	16.2	16.7

⁺ Does not exceed 0.05 MMT CO₂ Eq.

^a See Annex 3.2 for definitions of on-road vehicle types.

^b Gasoline and diesel highway vehicle mileage estimates are based on data from FHWA Highway Statistics Table VM-1. VMT estimates from FHWA are allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model).

^c Nonroad fuel consumption estimates for 2020 are adjusted to account for the COVID-19 pandemic and associated restrictions. For agricultural equipment and airport equipment, sector specific adjustment factors were applied to the 2019 data. For all other sectors, a 7.7 percent reduction factor is used, based on transportation diesel use (EIA 2022).

^d Rail emissions do not include emissions from electric powered locomotives. Class II and Class III diesel consumption data for 2014 to 2021 is estimated by applying the historical average fuel usage per carload factor to the annual number of carloads.

^e Includes equipment, such as tractors and combines, as well as fuel consumption from trucks that are used off-road in agriculture.

f Includes equipment, such as cranes, dumpers, and excavators, as well as fuel consumption from trucks that are used off-road in construction.

^g "Other" includes snowmobiles and other recreational equipment, logging equipment, lawn and garden equipment, railroad equipment, airport equipment, commercial equipment, and industrial equipment, as well as fuel consumption from trucks that are used off-road for commercial/industrial purposes.

^a See Annex 3.2 for definitions of on-road vehicle types.

^b Gasoline and diesel highway vehicle mileage estimates are based on data from FHWA Highway Statistics Table VM-1. VMT estimates from FHWA are allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model).

^c Nonroad fuel consumption estimates for 2020 are adjusted to account for the COVID-19 pandemic and associated restrictions. For agricultural equipment and airport equipment, sector specific adjustment factors were applied to the 2019 data. For all other sectors, a 7.7 percent reduction factor is used, based on transportation diesel use (EIA 2022).

- ^d Rail emissions do not include emissions from electric powered locomotives. Class II and Class III diesel consumption data for 2014 through 2021 is estimated by applying the historical average fuel usage per carload factor to the annual number of carloads.
- ^e Includes equipment, such as tractors and combines, as well as fuel consumption from trucks that are used off-road in agriculture.
- f Includes equipment, such as cranes, dumpers, and excavators, as well as fuel consumption from trucks that are used offroad in construction.
- ^g "Other" includes snowmobiles and other recreational equipment, logging equipment, lawn and garden equipment, railroad equipment, airport equipment, commercial equipment, and industrial equipment, as well as fuel consumption from trucks that are used off-road for commercial/industrial purposes.

Note: Totals may not sum due to independent rounding.

CO₂ from Fossil Fuel Combustion

Methodology and Time-Series Consistency

 CO_2 emissions from fossil fuel combustion are estimated in line with a Tier 2 method described by the IPCC in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2006) with some exceptions as discussed below. ²⁸ A detailed description of the U.S. methodology is presented in Annex 2.1, and is characterized by the following steps:

1. Determine total fuel consumption by fuel type and sector. Total fossil fuel consumption for each year is estimated by aggregating consumption data by end-use sector (e.g., commercial, industrial), primary fuel type (e.g., coal, petroleum, gas), and secondary fuel category (e.g., motor gasoline, distillate fuel oil). Fuel consumption data for the United States were obtained directly from the EIA of the U.S. Department of Energy (DOE), primarily from the Monthly Energy Review (EIA 2023a). EIA data include fuel consumption statistics from the 50 U.S. states and the District of Columbia, including tribal lands. The EIA does not include territories in its national energy statistics, so fuel consumption data for territories were collected separately from EIA's International Energy Statistics (EIA 2023b). 29

For consistency of reporting, the IPCC has recommended that countries report energy data using the International Energy Agency (IEA) reporting convention and/or IEA data. Data in the IEA format are presented "top down"—that is, energy consumption for fuel types and categories are estimated from energy production data (accounting for imports, exports, stock changes, and losses). The resulting quantities are referred to as "apparent consumption." The data collected in the United States by EIA on an annual basis and used in this Inventory are predominantly from mid-stream or conversion energy consumers such as refiners and electric power generators. These annual surveys are supplemented with end-use energy consumption surveys, such as the Manufacturing Energy Consumption Survey, that are conducted on a periodic basis (every four years). These consumption datasets help inform the annual surveys to arrive at the national total and sectoral breakdowns for that total.³⁰

Also, note that U.S. fossil fuel energy statistics are generally presented using gross calorific values (GCV) (i.e., higher heating values). Fuel consumption activity data presented here have not been adjusted to

²⁸ The IPCC Tier 3B methodology is used for estimating emissions from commercial aircraft.

²⁹ Fuel consumption by U.S. Territories (i.e., American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other U.S. Pacific Islands) is included in this report and contributed total emissions of 23.8 MMT CO₂ Eq. in 2021.

 $^{^{30}}$ See IPCC Reference Approach for Estimating CO₂ Emissions from Fossil Fuel Combustion in Annex 4 for a comparison of U.S. estimates using top-down and bottom-up approaches.

correspond to international standards, which are to report energy statistics in terms of net calorific values (NCV) (i.e., lower heating values). 31

- 2. Subtract uses accounted for in the Industrial Processes and Product Use chapter. Portions of the fuel consumption data for seven fuel categories—coking coal, distillate fuel, industrial other coal, petroleum coke, natural gas, residual fuel oil, and other oil—were reallocated to the Industrial Processes and Product Use chapter, as they were consumed during non-energy-related industrial activity. To make these adjustments, additional data were collected from AISI (2004 through 2021), Coffeyville (2012), U.S. Census Bureau (2001 through 2011), EIA (2023a, 2022b, 2022c), USAA (2008 through 2021), USGS (1991 through 2020), (USGS 2019), USGS (2014 through 2021a), USGS (2014 through 2021b), USGS (1995 through 2013), USGS (1995, 1998, 2000, 2001, 2002, 2007), USGS (2021a), USGS (1991 through 2015a), USGS (1991 through 2020), USGS (2014 through 2021a), USGS (1991 through 2015b), USGS (2021b), USGS (1991 through 2020).32
- 3. Adjust for biofuels and petroleum denaturant. Fossil fuel consumption estimates are adjusted downward to exclude fuels with biogenic origins and avoid double counting in petroleum data statistics. Carbon dioxide emissions from ethanol added to motor gasoline and biodiesel added to diesel fuel are not included specifically in summing energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF, therefore, fuel consumption estimates are adjusted to remove ethanol and biodiesel. 33 For the years 1993 through 2008, petroleum denaturant is currently included in EIA statistics for both natural gasoline and finished motor gasoline. To avoid double counting, petroleum denaturant is subtracted from finished motor gasoline for these years. 34
- 4. Adjust for exports of CO₂. Since October 2000, the Dakota Gasification Plant has been exporting CO₂ produced in the coal gasification process to Canada by pipeline. Because this CO₂ is not emitted to the atmosphere in the United States, the associated fossil fuel (lignite coal) that is gasified to create the exported CO2 is subtracted from EIA (2022c) coal consumption statistics that are used to calculate greenhouse gas emissions from the Energy Sector. The associated fossil fuel is the total fossil fuel burned at the plant with the CO₂ capture system multiplied by the fraction of the plant's total site-generated CO₂ that is recovered by the capture system. To make these adjustments, data for CO2 exports were collected from Environment and Climate Change Canada (2022). A discussion of the methodology used to estimate the amount of CO₂ captured and exported by pipeline is presented in Annex 2.1.
- 5. Adjust sectoral allocation of distillate fuel oil and motor gasoline. EPA conducted a separate bottom-up analysis of transportation fuel consumption based on data from the Federal Highway Administration that indicated that the amount of distillate and motor gasoline consumption allocated to the transportation sector in the EIA statistics should be adjusted. Therefore, for these estimates, the transportation sector's distillate fuel and motor gasoline consumption were adjusted to match the value obtained from the bottom-up analysis. As the total distillate and motor gasoline consumption estimate from EIA are considered to be accurate at the national level, the distillate and motor gasoline consumption totals for the residential, commercial, and industrial sectors were adjusted proportionately. The data sources used in the bottom-up analysis of transportation fuel consumption include AAR (2008 through 2022), Benson

3-32 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

³¹ A crude convention to convert between gross and net calorific values is to multiply the heat content of solid and liquid fossil fuels by 0.95 and gaseous fuels by 0.9 to account for the water content of the fuels. Biomass-based fuels in U.S. energy statistics, however, are generally presented using net calorific values.

³² See sections on Iron and Steel Production and Metallurgical Coke Production, Ammonia Production and Urea Consumption, Petrochemical Production, Titanium Dioxide Production, Ferroalloy Production, Aluminum Production, and Silicon Carbide Production and Consumption in the Industrial Processes and Product Use chapter.

³³ Natural gas energy statistics from EIA (2023d) are already adjusted downward to account for biogas in natural gas.

³⁴ These adjustments are explained in greater detail in Annex 2.1.

- (2002 through 2004), DOE (1993 through 2020), EIA (2007), EIA (2023a), EPA (2022c), and FHWA (1996 through 2021).³⁵
- 6. Adjust for fuels consumed for non-energy uses. U.S. aggregate energy statistics include consumption of fossil fuels for non-energy purposes. These are fossil fuels that are manufactured into plastics, asphalt, lubricants, or other products. Depending on the end-use, this can result in storage of some or all of the C contained in the fuel for a period of time. As the emission pathways of C used for non-energy purposes are vastly different than fuel combustion (since the C in these fuels ends up in products instead of being combusted), these emissions are estimated separately in Section 3.2 Carbon Emitted and Stored in Products from Non-Energy Uses of Fossil Fuels. Therefore, the amount of fuels used for non-energy purposes was subtracted from total fuel consumption. Data on non-fuel consumption were provided by EIA (2022b).
- 7. Subtract consumption of international bunker fuels. According to the UNFCCC reporting guidelines emissions from international transport activities, or bunker fuels, should not be included in national totals. U.S. energy consumption statistics include these bunker fuels (e.g., distillate fuel oil, residual fuel oil, and jet fuel) as part of consumption by the transportation end-use sector, however, so emissions from international transport activities were calculated separately following the same procedures used to calculate emissions from consumption of all fossil fuels (i.e., estimation of consumption, and determination of carbon content). The Office of the Under Secretary of Defense (Installations and Environment) and the Defense Logistics Agency Energy (DLA Energy) of the U.S. Department of Defense (DoD) (DLA Energy 2022) supplied data on military jet fuel and marine fuel use. Commercial jet fuel use was estimated based on data from FAA (2023) and DOT (1991 through 2022); residual and distillate fuel use for civilian marine bunkers was obtained from DOC (1991 through 2022) for 1990 through 2001 and 2007 through 2020, and DHS (2008) for 2003 through 2006. Consumption of these fuels was subtracted from the corresponding fuels totals in the transportation end-use sector. Estimates of international bunker fuel emissions for the United States are discussed in detail in Section 3.9 International Bunker Fuels.
- 8. Determine the total carbon content of fuels consumed. Total C was estimated by multiplying the amount of fuel consumed by the amount of C in each fuel. This total C estimate defines the maximum amount of C that could potentially be released to the atmosphere if all of the C in each fuel was converted to CO₂. A discussion of the methodology and sources used to develop the C content coefficients are presented in Annexes 2.1 and 2.2.
- 9. Estimate CO₂ Emissions. Total CO₂ emissions are the product of the adjusted energy consumption (from the previous methodology steps 1 through 7), the carbon content of the fuels consumed, and the fraction of C that is oxidized. The fraction oxidized was assumed to be 100 percent for petroleum, coal, and natural gas based on guidance in IPCC (2006) (see Annex 2.1). Carbon emissions were multiplied by the molecular-to-atomic weight ratio of CO₂ to C (44/12) to obtain total CO₂ emitted from fossil fuel combustion in million metric tons (MMT).
- 10. Allocate transportation emissions by vehicle type. This report provides a more detailed accounting of emissions from transportation because it is such a large consumer of fossil fuels in the United States. For fuel types other than jet fuel, fuel consumption data by vehicle type and transportation mode were used

Case 5:23-cv-00304-H

³⁵ Bottom-up gasoline and diesel highway vehicle fuel consumption estimates are based on data from FHWA Highway Statistics Table MF-21, MF-27, and VM-1 (FHWA 1996 through 2021).

³⁶ See International Bunker Fuels section in this chapter for a more detailed discussion.

³⁷ Data for 2002 were interpolated due to inconsistencies in reported fuel consumption data.

to allocate emissions by fuel type calculated for the transportation end-use sector. Heat contents and densities were obtained from EIA (2022b) and USAF (1998). 38

- For on-road vehicles, annual estimates of combined motor gasoline and diesel fuel consumption by vehicle category were obtained from FHWA (1996 through 2021); for each vehicle category, the percent gasoline, diesel, and other (e.g., CNG, LPG) fuel consumption are estimated using data from EPA's MOVES model and DOE (1993 through 2022).
- For non-road vehicles, activity data were obtained from AAR (2008 through 2022), APTA (2007 through 2021), APTA (2006), BEA (1991 through 2015), Benson (2002 through 2004), DLA Energy (2022), DOC (1991 through 2022), DOE (1993 through 2022), DOT (1991 through 2022), EIA (2009a), EIA (2023d), EIA (2002), EIA (1991 through 2022), EPA (2022c), ⁴¹ and Gaffney (2007).
- For jet fuel used by aircraft, CO₂ emissions from commercial aircraft were developed by the U.S. Federal Aviation Administration (FAA) using a Tier 3B methodology, consistent IPCC (2006) (see Annex 3.3). Carbon dioxide emissions from other aircraft were calculated directly based on reported consumption of fuel as reported by EIA. Allocation to domestic military uses was made using DoD data (see Annex 3.8). General aviation jet fuel consumption is calculated as the remainder of total jet fuel use (as determined by EIA) nets all other jet fuel use as determined by FAA and DoD. For more information, see Annex 3.2.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. Due to data availability and sources, some adjustments outlined in the methodology above are not applied consistently across the full 1990 to 2021 time series. As described in greater detail in Annex 2.1, to align with EIA's methodology for calculating motor gasoline consumption, petroleum denaturant adjustments are applied to motor gasoline consumption only for the period 1993 through 2008. In addition to ensuring time-series consistency, to ensure consistency in reporting between the Inventory and the Canadian National Greenhouse Gas Inventory, the amount of associated fossil fuel (lignite coal) that is gasified to create the exported CO₂ from the Dakota Gasification Plant is adjusted to align with the Canadian National Greenhouse Gas Inventory (Environment and Climate Change Canada 2022). This adjustment is explained in greater detail in Annex 2.1. As discussed in Annex 5, data are unavailable to include estimates of CO₂ emissions from any liquid fuel used in pipeline transport or non-hazardous industrial waste incineration, but those emissions are assumed to be insignificant.

Box 3-4: Carbon Intensity of U.S. Energy Consumption

The amount of C emitted from the combustion of fossil fuels is dependent upon the carbon content of the fuel and the fraction of that C that is oxidized. Fossil fuels vary in their average carbon content, ranging from about

 $^{^{38}}$ For a more detailed description of the data sources used for the analysis of the transportation end use sector see the Mobile Combustion (excluding CO_2) and International Bunker Fuels sections of the Energy chapter, Annex 3.2, and Annex 3.8, respectively.

³⁹ On-road fuel consumption data from FHWA Table MF-21 and MF-27 were used to determine total on-road use of motor gasoline and diesel fuel (FHWA 1996 through 2020). Data for 2021 is proxied using FHWA Traffic Volume Travel Trends. Ratios developed from MOVES3 output are used to apportion FHWA fuel consumption data to vehicle type and fuel type (see Annex 3.2 for information about the MOVES model).

⁴⁰ Transportation sector natural gas and LPG consumption are based on data from EIA (2023a). In previous Inventory years, data from DOE (1993 through 2022) TEDB was used to estimate each vehicle class's share of the total natural gas and LPG consumption. Since TEDB does not include estimates for natural gas use by medium- and heavy-duty trucks or LPG use by passenger cars, EIA Alternative Fuel Vehicle Data (Browning 2017) is now used to determine each vehicle class's share of the total natural gas and LPG consumption. These changes were first incorporated in the 1990 through 2015 Inventory and apply to the time period from 1990 to 2015.

⁴¹ In 2014, EPA incorporated the NONROAD2008 model into the MOVES model framework (EPA 2022c). The current Inventory uses the Nonroad component of MOVES3 for years 1999 through 2021.

53 MMT CO₂ Eq./QBtu for natural gas to upwards of 95 MMT CO₂ Eq./QBtu for coal and petroleum coke (see Tables A-42 and A-43 in Annex 2.1 for carbon contents of all fuels). In general, the carbon content per unit of energy of fossil fuels is the highest for coal products, followed by petroleum, and then natural gas. The overall carbon intensity of the U.S. economy is thus dependent upon the quantity and combination of fuels and other energy sources employed to meet demand.

Table 3-16 provides a time series of the carbon intensity of direct emissions for each sector of the U.S. economy. The time series incorporates only the energy from the direct combustion of fossil fuels in each sector. For example, the carbon intensity for the residential sector does not include the energy from or emissions related to the use of electricity for lighting, as it is instead allocated to the electric power sector. For the purposes of maintaining the focus of this section, renewable energy and nuclear energy are not included in the energy totals used in Table 3-16 in order to focus attention on fossil fuel combustion as detailed in this chapter. Looking only at this direct consumption of fossil fuels, the residential sector exhibited the lowest carbon intensity, which is related to the large percentage of its energy derived from natural gas for heating. The carbon intensity of the commercial sector has predominantly declined since 1990 as commercial businesses shift away from petroleum to natural gas. The industrial sector was more dependent on petroleum and coal than either the residential or commercial sectors, and thus had higher C intensities over this period. The carbon intensity of the transportation sector was closely related to the carbon content of petroleum products (e.g., motor gasoline and jet fuel, both around 70 MMT CO₂ Eq./QBtu), which were the primary sources of energy. Lastly, the electric power sector had the highest carbon intensity due to its heavy reliance on coal for generating electricity.

Table 3-16: Carbon Intensity from Direct Fossil Fuel Combustion by Sector (MMT CO₂ Eq./QBtu)

Sector	1990	2005	2017	2018	2019	2020	2021
Residentiala	57.4	56.8	55.1	55.3	55.2	55.1	55.0
Commercial ^a	59.7	57.8	56.6	56.0	56.1	56.2	56.0
Industrial ^a	64.6	64.7	60.8	60.5	60.3	59.8	59.5
Transportation ^a	71.1	71.5	71.2	71.0	70.9	70.8	70.9
Electric Powerb	87.3	85.8	77.3	75.5	72.9	70.5	72.4
U.S. Territories ^c	73.1	73.4	71.0	70.4	70.8	71.7	70.1
All Sectors ^c	73.1	73.6	69.1	68.3	67.3	66.3	67.0

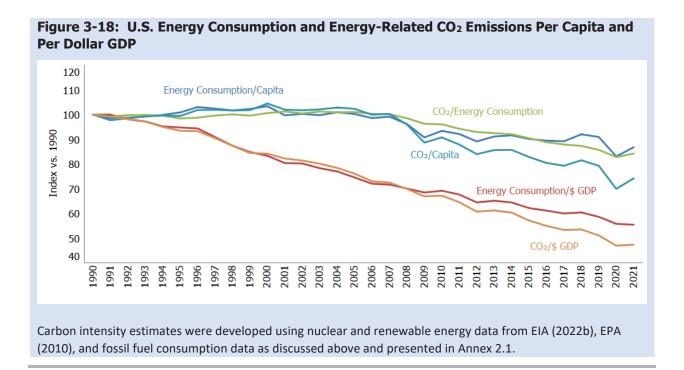
^a Does not include electricity or renewable energy consumption.

Note: Excludes non-energy fuel use emissions and consumption.

For the time period of 1990 through about 2008, the carbon intensity of U.S. energy consumption was fairly constant, as the proportion of fossil fuels used by the individual sectors did not change significantly over that time. Starting in 2008 the carbon intensity has decreased, reflecting the shift from coal to natural gas in the electric power sector during that time period. Per capita energy consumption fluctuated little from 1990 to 2007, but then started decreasing after 2007 and, in 2021, was approximately 13.2 percent below levels in 1990 (see Figure 3-18). To differentiate these estimates from those of Table 3-16, the carbon intensity trend shown in Figure 3-18 and described below includes nuclear and renewable energy EIA data to provide a comprehensive economy-wide picture of energy consumption. Due to a general shift from a manufacturing-based economy to a service-based economy, as well as overall increases in efficiency, energy consumption and energy-related CO₂ emissions per dollar of gross domestic product (GDP) have both declined since 1990 (BEA 2022).

^b Does not include electricity produced using nuclear or renewable energy.

^c Does not include nuclear or renewable energy consumption.



Uncertainty

For estimates of CO_2 from fossil fuel combustion, the amount of CO_2 emitted is directly related to the amount of fuel consumed, the fraction of the fuel that is oxidized, and the carbon content of the fuel. Therefore, a careful accounting of fossil fuel consumption by fuel type, average carbon contents of fossil fuels consumed, and production of fossil fuel-based products with long-term carbon storage should yield an accurate estimate of CO_2 emissions.

Nevertheless, there are uncertainties in the consumption data, carbon content of fuels and products, and carbon oxidation efficiencies. For example, given the same primary fuel type (e.g., coal, petroleum, or natural gas), the amount of carbon contained in the fuel per unit of useful energy can vary. For the United States, however, the impact of these uncertainties on overall CO₂ emission estimates is believed to be relatively small. See, for example, Marland and Pippin (1990). See also Annex 2.2 for a discussion of uncertainties associated with fuel carbon contents. Recent updates to carbon factors for natural gas and coal utilized the same approach as previous Inventories with updated recent data, therefore, the uncertainty estimates around carbon contents of the different fuels as outlined in Annex 2.2 were not impacted and the historic uncertainty ranges still apply.

Although national statistics of total fossil fuel and other energy consumption are relatively accurate, the allocation of this consumption to individual end-use sectors (i.e., residential, commercial, industrial, and transportation) is less certain. For example, for some fuels the sectoral allocations are based on price rates (i.e., tariffs), but a commercial establishment may be able to negotiate an industrial rate or a small industrial establishment may end up paying an industrial rate, leading to a misallocation of emissions. Also, the deregulation of the natural gas industry and the more recent deregulation of the electric power industry have likely led to some minor challenges in collecting accurate energy statistics as firms in these industries have undergone significant restructuring.

To calculate the total CO_2 emission estimate from energy-related fossil fuel combustion, the amount of fuel used in non-energy production processes were subtracted from the total fossil fuel consumption. The amount of CO_2 emissions resulting from non-energy related fossil fuel use has been calculated separately and reported in the Carbon Emitted from Non-Energy Uses of Fossil Fuels section of this report (Section 3.2). These factors all contribute to the uncertainty in the CO_2 estimates. Detailed discussions on the uncertainties associated with C emitted from non-energy uses of fossil fuels can be found within that section of this chapter.

Various sources of uncertainty surround the estimation of emissions from international bunker fuels, which are subtracted from the U.S. totals (see the detailed discussions on these uncertainties provided in Section 3.9 – International Bunker Fuels). Another source of uncertainty is fuel consumption by U.S. Territories. The United States does not collect energy statistics for its territories at the same level of detail as for the fifty states and the District of Columbia. Therefore, estimating both emissions and bunker fuel consumption by these territories is

Uncertainties in the emission estimates presented above also result from the data used to allocate CO2 emissions from the transportation end-use sector to individual vehicle types and transport modes. In many cases, bottom-up estimates of fuel consumption by vehicle type do not match aggregate fuel-type estimates from EIA. Further research is planned to improve the allocation into detailed transportation end-use sector emissions.

The uncertainty analysis was performed by primary fuel type for each end-use sector, using the IPCCrecommended Approach 2 uncertainty estimation methodology, Monte Carlo Stochastic Simulation technique, with @RISK software. For this uncertainty estimation, the inventory estimation model for CO2 from fossil fuel combustion was integrated with the relevant variables from the inventory estimation model for International Bunker Fuels, to realistically characterize the interaction (or endogenous correlation) between the variables of these two models. About 170 input variables were modeled for CO₂ from energy-related fossil fuel combustion (including about 20 for non-energy fuel consumption and about 20 for International Bunker Fuels).

In developing the uncertainty estimation model, uniform distributions were assumed for all activity-related input variables and emission factors, based on the SAIC/EIA (2001) report. 42 Triangular distributions were assigned for the oxidization factors (or combustion efficiencies). The uncertainty ranges were assigned to the input variables based on the data reported in SAIC/EIA (2001) and on conversations with various agency personnel. 43

The uncertainty ranges for the activity-related input variables were typically asymmetric around their inventory estimates; the uncertainty ranges for the emissions factors were symmetric. Bias (or systematic uncertainties) associated with these variables accounted for much of the uncertainties associated with these variables (SAIC/EIA 2001). ⁴⁴ For purposes of this uncertainty analysis, each input variable was simulated 10,000 times through Monte Carlo sampling.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-17. Fossil fuel combustion CO₂ emissions in 2021 were estimated to be between 4,408.8 and 4,994.4 MMT CO₂ Eq. at a 95 percent confidence level. This indicates a range of 2 percent below to 4 percent above the 2021 emission estimate of 4,639.1 MMT CO₂ Eq.

⁴² SAIC/EIA (2001) characterizes the underlying probability density function for the input variables as a combination of uniform and normal distributions (the former to represent the bias component and the latter to represent the random component). However, for purposes of the current uncertainty analysis, it was determined that uniform distribution was more appropriate to characterize the probability density function underlying each of these variables.

⁴³ In the SAIC/EIA (2001) report, the quantitative uncertainty estimates were developed for each of the three major fossil fuels used within each end-use sector; the variations within the sub-fuel types within each end-use sector were not modeled. However, for purposes of assigning uncertainty estimates to the sub-fuel type categories within each end-use sector in the current uncertainty analysis, SAIC/EIA (2001)-reported uncertainty estimates were extrapolated.

⁴⁴ Although, in general, random uncertainties are the main focus of statistical uncertainty analysis, when the uncertainty estimates are elicited from experts, their estimates include both random and systematic uncertainties. Hence, both these types of uncertainties are represented in this uncertainty analysis.

Table 3-17: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Energy-Related Fossil Fuel Combustion by Fuel Type and Sector (MMT CO₂ Eq. and Percent)

	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a				
Fuel/Sector	(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)		
		Lower	Upper	Lower	Upper	
		Bound	Bound	Bound	Bound	
Coal ^b	957.3	908.1	1,068.6	-3%	9%	
Residential	NO	NO	NO	NO	NO	
Commercial	1.4	1.3	1.7	-5%	15%	
Industrial	43.0	39.9	50.9	-5%	16%	
Transportation	NO	NO	NO	NO	NO	
Electric Power	909.9	857.6	1015.8	-4%	10%	
U.S. Territories	2.9	2.4	3.6	-12%	19%	
Natural Gas ^b	1,621.0	1,569.54	1,728.7	-1%	5%	
Residential	258.6	249.0	279.3	-3%	7%	
Commercial	180.9	174.0	195.1	-3%	7%	
Industrial	499.6	477.2	543.5	-3%	7%	
Transportation	65.1	62.6	70.3	-3%	7%	
Electric Power	612.9	589.0	649.3	-3%	5%	
U.S. Territories	3.9	3.4	4.6	-12%	17%	
Petroleum ^b	2,060.4	1,859.1	2,253.1	-6%	6%	
Residential	54.7	49.8	59.6	-6%	6%	
Commercial	50.7	46.2	55.2	-5%	5%	
Industrial	232.9	158.6	310.3	-23%	23%	
Transportation	1,687.3	1,530.6	1,846.3	-6%	6%	
Electric Power	17.7	16.3	19.7	-5%	8%	
U.S. Territories	17.0	14.9	19.6	-7%	10%	
Geothermal	0.4	0.1	1.2	-47%	172%	
Electric Power	0.4	0.1	1.2	-47%	172%	
Total (including Geothermal)b	4,639.1	4,408.8	4,994.4	-2%	4%	

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

QA/QC and Verification

In order to ensure the quality of the CO_2 emission estimates from fossil fuel combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and methodology used for estimating CO_2 emissions from fossil fuel combustion in the United States. Emission totals for the different sectors and fuels were compared and trends were investigated to determine whether any corrective actions were needed. Minor corrective actions were taken.

One area of QA/QC and verification is to compare the estimates and emission factors used in the Inventory with other sources of CO₂ emissions reporting. Two main areas and sources of data were considered. The first is a comparison with the EPA GHGRP combustion data (subpart C) for stationary combustion sources excluding the electric power sector. This mainly focused on considering carbon factors for natural gas. The second comparison is with the EPA Air Markets Program data for electric power production. This considered carbon factors for coal and natural gas used in electric power production.

NE (Not Estimated)

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

^b The low and high estimates for total emissions were calculated separately through simulations and, hence, the low and high emission estimates for the sub-source categories do not sum to total emissions.

The EPA GHGRP collects greenhouse gas emissions data from large emitters including information on fuel combustion. This excludes emissions from mobile sources and smaller residential and commercial sources, those emissions are covered under supplier reporting (subparts MM and NN) and are areas for further research. Fuel combustion CO2 data reported in 2021 was 2,084.0 MMT CO2. Of that, 1,581.4 MMT CO2 was from electricity production. Therefore, the non-electric power production fuel combustion reporting was a fraction of the total covered by the Inventory under fossil fuel combustion. Furthermore, reporters under the GHGRP can use multiple methods of calculating emissions; one method is to use the default emission factors provided in the rule, while another is based on a tier 3 approach using their own defined emission factors. Based on data from reporters on approach used, it was determined that only about 10 percent of natural gas combustion emissions were based on a tier 3 approach. Given the small sample size compared to the overall Inventory calculations for natural gas combustion EPA determined it was not reasonable to consider the GHGRP tier 3 natural gas factors at this time.

EPA collects detailed sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon dioxide (CO₂) emissions data and other information from power plants across the country as part of the Acid Rain Program (ARP), the Cross-State Air Pollution Rule (CSAPR), the CSAPR Update, and the Revised CSAPR Update (RCU). The CO₂ data from these Air Market Programs (AMP) can be compared to the electric power sector emissions calculated from the Inventory as shown in Table 3-18 for the three most recent years of data.

Table 3-18: Comparison of Electric Power Sector Emissions (MMT CO₂ Eq. and Percent)

Fuel/Sector	CO ₂ Er	missions (MMT CO	% Change	е	
	2019	2020	2021	19-20	20-21
Inventory Electric Power Sector	1,606.7	1,439.6	1,540.9	-10.4%	7.0%
Coal	973.5	788.2	909.9	-19.0%	15.5%
Natural Gas	616.6	634.8	612.9	3.0%	-3.5%
Petroleum	16.2	16.2	17.7	0.0%	9.6%
AMP Electric Power Sector	1,605.4	1,437.7	1,538.6	-10.4%	7.0%
Coal	980.9	796.3	917.2	-18.8%	15.2%
Natural Gas	616.4	632.6	612.7	2.6%	-3.2%
Petroleum	8.1	8.8	8.7	7.8%	-0.6%

Note: Totals may not sum due to independent rounding.

In general the emissions and trends from the two sources line up well. There are differences expected based on coverage and scope of each source. The Inventory covers all emissions from the electric power sector as defined above. The EPA AMP data covers emissions from electricity generating units of a certain size so in some respects it could cover more sources (like electric power units at industrial facilities that would be covered under the industrial sector in the Inventory) and not as many sources (since smaller units are excluded). The EPA AMP data also includes heat input for different fuel types. That data can be combined with emissions to calculate implied emission factors. ⁴⁵ The following Table 3-19 shows the implied emissions factors for coal and natural gas from the EPA AMP data compared to the factors used in the Inventory for the three most recent years of data.

Table 3-19: Comparison of Emissions Factors (MMT Carbon/QBtu)

Fuel Type	2019	2020	2021
EPA AMP			
Coal	25.52	25.52	25.55
Natural Gas	14.43	14.47	14.50
EPA Inventory			
Electric Power Coal	26.08	26.12	26.13
Natural Gas	14.43	14.43	14.43

⁴⁵ These emission factors can be converted from MMT Carbon/QBtu to MMT CO₂ Eq./QBtu by multiplying the emission factor by 44/12, the molecular-to-atomic weight ratio of CO₂ to C. This would assume the fraction oxidized to be 100 percent, which is the guidance in IPCC (2006) (see Annex 2.1).

The factors for natural gas line up reasonably well. For coal the EPA emissions factors are roughly 2 percent higher than those calculated from the EPA AMP data. One possible reason for the difference is that the EPA Inventory factors are based on all coal used in electric power production while the factors from the EPA AMP data are based on units where coal is the source of fuel used. There are units that use coal and other fuel sources but emissions for each fuel type could not be calculated. This is an area of further research but given current data available the approach to develop carbon factors as outlined in Annex 2 is still felt to be the most appropriate to represent total fuel combustion in the United States.

The UNFCCC reporting guidelines also require countries to complete a "top-down" reference approach for estimating CO₂ emissions from fossil fuel combustion in addition to their "bottom-up" sectoral methodology. The reference approach (detailed in Annex 4) uses alternative methodologies and different data sources than those contained in this section of the report. The reference approach estimates fossil fuel consumption by adjusting national aggregate fuel production data for imports, exports, and stock changes rather than relying on end-user consumption surveys. The reference approach assumes that once carbon-based fuels are brought into a national economy, they are either saved in some way (e.g., stored in products, kept in fuel stocks, or left unoxidized in ash) or combusted, and therefore the carbon in them is oxidized and released into the atmosphere. In the reference approach, accounting for actual consumption of fuels at the sectoral or sub-national level is not required. One difference between the two approaches is that emissions from carbon that was not stored during non-energy use of fuels are subtracted from the sectoral approach and reported separately (see Section 3.2). These emissions, however, are not subtracted in the reference approach. As a result, the reference approach emission estimates are comparable to those of the sectoral approach, with the exception that the Non-Energy Use (NEU) source category emissions are included in the reference approach (see Annex 4 for more details).

Recalculations Discussion

Several updates to activity data and emission factors lead to recalculations of previous year results. The major updates are as follows:

- EIA (2023a) updated energy consumption statistics across the time series relative to the previous Inventory. This includes an update to transportation sector propane consumption data post 2010.
- EIA (2023a) updated industrial energy sector activity data post 2010 relative to the previous Inventory.
 This caused the annually variable carbon contents for HGL (energy use) and HGL (non-energy use) to be updated across the time series, because post 2010 data is used to back-cast data for prior years. EIA (2023a) updated petroleum statistics in coordination with its Petroleum Supply Annual 2021. This impacted the HGL category across the time series.
- EPA revised territories data to correct for an error in how LPG data was pulled. The values for LPG were
 previously referencing the values for Other Petroleum from the EIA's International Energy Statistics (EIA
 2023b) and have been corrected to reflect the values for Liquified Petroleum Gas from the same source.
- Natural gas consumption data from EIA's *Monthly Energy Review* (EIA 2023a) Table 10b was updated, which impacted years 2018 through 2020.
- The carbon content for propylene was updated from 65.95 kg CO₂/MMBtu to 67.77 kg CO₂/MMBtu to reflect values used in the EPA Greenhouse Gas Emission Factors Hub.
- Fuel consumption for the U.S. Territories provided by EIA's International Energy Statistics (EIA 2023b) was updated across the time series.
- Updated values of natural gas used for ammonia production across the time series relative to the previous Inventory.
- The collection of data for EIA's Fuel Oil and Kerosene Sales (FOKS) data set was discontinued for 2021 data. Instead, data from EIA's *Monthly Energy Review* (EIA 2023a) was used to allocate distillate fuel consumption for the residential, commercial, and industrial sectors.

Case 5:23-cv-00304-H

CO₂-equivalent emissions of CH₄ and N₂O have been revised to reflect the 100-year global warming potential (GWP) values provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4), used in previous Inventories (IPCC 2007). The AR5 GWP values have been applied across the entire time series for consistency. Prior inventories used GWP values of 25 and 298 for CH₄ and N₂O, respectively. These values have been updated to 28 and 265, respectively.

All of the revisions discussed above resulted in the following impacts on emissions over time:

- From 1990 to 2020, petroleum emissions from the residential sector decreased by an average annual amount of 0.09 MMT CO₂ Eq. (less than half a percent). Petroleum emissions from the commercial, industrial, and transportation sectors increased by an average annual amount of 0.05 MMT CO2 Eq. (less than half a percent), 0.15 MMT CO₂ Eq. (less than half a percent), and 0.07 MMT CO₂ Eq. (less than half a percent), respectively. These changes are due to changes in EIA consumption statistics for petroleum, changes in EIA industrial energy sector activity data, and the change in carbon content for propylene.
- Petroleum emissions from U.S. Territories decreased by an average annual amount of 1.82 MMT CO₂ Eq. (5.49 percent) due to the correction in data pulled for LPG from 1990 to 2020, change in carbon content for propylene, and change in fuel consumption data for U.S. Territories.
- Natural gas emissions across the residential, commercial, transportation, and electric power sectors for years 2018 to 2020 increased by an average annual amount of 0.19 MMT CO2 Eq. (less than half a percent) due to an update in natural gas consumption for these sectors in EIA's Monthly Energy Review (EIA 2023a) Table 10b.
- Natural gas emissions for the industrial sector from 1990 through 2017 decreased by an average annual amount of 1.00 MMT CO₂ Eq. (less than half a percent) due to an update in the correction for natural gas used for ammonia production. Natural gas emissions for the industrial sector from 2018 to 2020 decreased by 0.03 MMT CO₂ Eq. (less than half a percent) due to updates to both ammonia production and MER table 10b.
- Coal emissions from U.S. Territories decreased by an average annual amount of less than 0.01 MMT CO2 Eq. (less than half a percent) due to the change in fuel consumption data for U.S. Territories.
- Allocating distillate fuel oil consumption using EIA (2023) instead of EIA FOKS resulted in an average annual change of less than 1 Btu (less than half a percent) across the residential, commercial, and industrial sectors.
- Updating GWP values to AR5 values did not impact CO₂ emissions, but CH₄ and N₂O emissions increased 12 percent and decreased 11 percent, respectively. Changes to CH₄ and N₂O emissions from stationary and mobile combustion are discussed in their respective sections below.

Overall, these changes resulted in an average annual decrease of 2.5 MMT CO₂ Eq. (less than 0.05 percent) in CO₂ emissions from fossil fuel combustion for the period 1990 through 2020, relative to the previous Inventory. However, there were bigger absolute changes across the time series as discussed above.

Planned Improvements

To reduce uncertainty of CO₂ from fossil fuel combustion estimates for U.S. Territories, further expert elicitation may be conducted to better quantify the total uncertainty associated with emissions from U.S. Territories. Additionally, although not technically a fossil fuel, since geothermal energy-related CO2 emissions are included for reporting purposes, further expert elicitation may be conducted to better quantify the total uncertainty associated with CO₂ emissions from geothermal energy use.

The availability of facility-level combustion emissions through EPA's GHGRP will continue to be examined to help better characterize the industrial sector's energy consumption in the United States and further classify total industrial sector fossil fuel combustion emissions by business establishments according to industrial economic activity type. Most methodologies used in EPA's GHGRP are consistent with IPCC methodologies, though for EPA's GHGRP, facilities collect detailed information specific to their operations according to detailed measurement standards, which may differ with the more aggregated data collected for the Inventory to estimate total, national U.S. emissions. In addition, and unlike the reporting requirements for this chapter under the UNFCCC reporting guidelines, some facility-level fuel combustion emissions reported under the GHGRP may also include industrial process emissions. ⁴⁶ In line with UNFCCC reporting guidelines, fuel combustion emissions are included in this chapter, while process emissions are included in the Industrial Processes and Product Use chapter of this report. In examining data from EPA's GHGRP that would be useful to improve the emission estimates for the CO₂ from fossil fuel combustion category, particular attention will also be made to ensure time-series consistency, as the facility-level reporting data from EPA's GHGRP are not available for all inventory years as reported in this Inventory.

Additional analyses will be conducted to align reported facility-level fuel types and IPCC fuel types per the national energy statistics. For example, additional work will look at CO_2 emissions from biomass to ensure they are separated in the facility-level reported data and maintaining consistency with national energy statistics provided by EIA. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will continue to be relied upon.⁴⁷

An ongoing planned improvement is to develop improved estimates of domestic waterborne fuel consumption. The Inventory estimates for residual and distillate fuel used by ships and boats is based in part on data on bunker fuel use from the U.S. Department of Commerce. Domestic fuel consumption is estimated by subtracting fuel sold for international use from the total sold in the United States. It may be possible to more accurately estimate domestic fuel use and emissions by using detailed data on marine ship activity. The feasibility of using domestic marine activity data to improve the estimates will continue to be investigated.

EPA is also evaluating the methods used to adjust for conversion of fuels and exports of CO₂. EPA is exploring the approach used to account for CO₂ transport, injection, and geologic storage, as part of this there may be changes made to accounting for CO₂ exports.

Finally, another ongoing planned improvement is to evaluate data availability to update the carbon and heat content of more fuel types accounted for in this Inventory. This update will impact consumption and emissions across all sectors and will improve consistency with EIA data as carbon and heat contents of fuels will be accounted for as annually variable and therefore improve accuracy across the time series. Some of the fuels considered in this effort include petroleum coke, residual fuel, and woody biomass.

CH₄ and N₂O from Stationary Combustion

Methodology and Time-Series Consistency

Methane and N_2O emissions from stationary combustion were estimated by multiplying fossil fuel and wood consumption data by emission factors (by sector and fuel type for industrial, residential, commercial, and U.S. Territories; and by fuel and technology type for the electric power sector). The electric power sector utilizes a Tier 2 methodology, whereas all other sectors utilize a Tier 1 methodology. The activity data and emission factors used are described in the following subsections.

More detailed information on the methodology for calculating emissions from stationary combustion, including emission factors and activity data, is provided in Annex 3.1.

Industrial, Residential, Commercial, and U.S. Territories

National coal, natural gas, fuel oil, and wood consumption data were grouped by sector: industrial, commercial, residential, and U.S. Territories. For the CH_4 and N_2O emission estimates, consumption data for each fuel were

⁴⁶ See https://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf#page=2.

⁴⁷ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

obtained from EIA's Monthly Energy Review (EIA 2023a). Because the United States does not include territories in its national energy statistics, fuel consumption data for territories were provided separately by EIA's International Energy Statistics (EIA 2023b). 48 Fuel consumption for the industrial sector was adjusted to subtract out mobile source construction and agricultural use, which is reported under mobile sources. Construction and agricultural mobile source fuel use was obtained from EPA (2022) and FHWA (1996 through 2022). Estimates for wood biomass consumption for fuel combustion do not include municipal solid waste, tires, etc., that are reported as biomass by EIA. Non-CO₂ emissions from combustion of the biogenic portion of municipal solid waste and tires is included under waste incineration (Section 3.2). Estimates for natural gas combustion do not include biogas, and therefore non-CO₂ emissions from biogas are not included (see the Planned Improvements section, below). Tier 1 default emission factors for the industrial, commercial, and residential end-use sectors were provided by the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2006). U.S. Territories' emission factors were estimated using the U.S. emission factors for the primary sector in which each fuel was combusted.

Electric Power Sector

The electric power sector uses a Tier 2 emission estimation methodology as fuel consumption for the electric power sector by control-technology type was based on EPA's Acid Rain Program Dataset (EPA 2023). Total fuel consumption in the electric power sector from EIA (2023a) was apportioned to each combustion technology type and fuel combination using a ratio of fuel consumption by technology type derived from EPA (2023) data. The combustion technology and fuel use data by facility obtained from EPA (2023) were only available from 1996 to 2020, so the consumption estimates from 1990 to 1995 were estimated by applying the 1996 consumption ratio by combustion technology type from EPA (2023) to the total EIA (2023a) consumption for each year from 1990 to 1995.

Emissions were estimated by multiplying fossil fuel and wood consumption by technology-, fuel-, and countryspecific Tier 2 emission factors. The Tier 2 emission factors used are based in part on emission factors published by EPA, and EPA's Compilation of Air Pollutant Emission Factors, AP-42 (EPA 1997) for coal wall-fired boilers, residual fuel oil, diesel oil and wood boilers, natural gas-fired turbines, and combined cycle natural gas units. 49

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021 as discussed below. As discussed in Annex 5, data are unavailable to include estimates of CH₄ and N₂O emissions from biomass use in Territories, but those emissions are assumed to be insignificant.

Uncertainty

Methane emission estimates from stationary sources exhibit high uncertainty, primarily due to difficulties in calculating emissions from wood combustion (i.e., fireplaces and wood stoves). The estimates of CH4 and N2O emissions presented are based on broad indicators of emissions (i.e., fuel use multiplied by an aggregate emission factor for different sectors), rather than specific emission processes (i.e., by combustion technology and type of emission control).

An uncertainty analysis was performed by primary fuel type for each end-use sector, using the IPCC-recommended Approach 2 uncertainty estimation methodology, Monte Carlo Stochastic Simulation technique, with @RISK software.

The uncertainty estimation model for this source category was developed by integrating the CH4 and N2O stationary source inventory estimation models with the model for CO₂ from fossil fuel combustion to realistically characterize the interaction (or endogenous correlation) between the variables of these three models. About 55

 48 U.S. Territories data also include combustion from mobile activities because data to allocate territories' energy use were unavailable. For this reason, CH₄ and N₂O emissions from combustion by U.S. Territories are only included in the stationary combustion totals.

⁴⁹ Several of the U.S. Tier 2 emission factors were used in IPCC (2006) as Tier 1 emission factors. See Table A-69 in Annex 3.1 for emission factors by technology type and fuel type for the electric power sector.

input variables were simulated for the uncertainty analysis of this source category (about 20 from the CO₂ emissions from fossil fuel combustion inventory estimation model and about 35 from the stationary source inventory models).

In developing the uncertainty estimation model, uniform distribution was assumed for all activity-related input variables and N_2O emission factors, based on the SAIC/EIA (2001) report. ⁵⁰ For these variables, the uncertainty ranges were assigned to the input variables based on the data reported in SAIC/EIA (2001). ⁵¹ However, the CH₄ emission factors differ from those used by EIA. These factors and uncertainty ranges are based on IPCC default uncertainty estimates (IPCC 2006).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-20. Stationary combustion CH_4 emissions in 2021 (including biomass) were estimated to be between 5.9 and 20.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 34 percent below to 127 percent above the 2021 emission estimate of 8.9 MMT CO_2 Eq. ⁵² Stationary combustion N_2O emissions in 2021 (including biomass) were estimated to be between 16.4 and 33.4 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 26 percent below to 51 percent above the 2021 emission estimate of 22.1 MMT CO_2 Eq.

Table 3-20: Approach 2 Quantitative Uncertainty Estimates for CH₄ and N₂O Emissions from Energy-Related Stationary Combustion, Including Biomass (MMT CO₂ Eq. and Percent)

	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a				
Source		(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)		
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	
Stationary Combustion	CH ₄	8.9	5.9	20.3	-34%	127%	
Stationary Combustion	N_2O	22.1	16.4	33.4	-26%	51%	

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

The uncertainties associated with the emission estimates of CH_4 and N_2O are greater than those associated with estimates of CO_2 from fossil fuel combustion, which mainly rely on the carbon content of the fuel combusted. Uncertainties in both CH_4 and N_2O estimates are due to the fact that emissions are estimated based on emission factors representing only a limited subset of combustion conditions. For the indirect greenhouse gases, uncertainties are partly due to assumptions concerning combustion technology types, age of equipment, emission factors used, and activity data projections.

QA/QC and Verification

In order to ensure the quality of the non-CO₂ emission estimates from stationary combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent

⁵⁰ SAIC/EIA (2001) characterizes the underlying probability density function for the input variables as a combination of uniform and normal distributions (the former distribution to represent the bias component and the latter to represent the random component). However, for purposes of the current uncertainty analysis, it was determined that uniform distribution was more appropriate to characterize the probability density function underlying each of these variables.

⁵¹ In the SAIC/EIA (2001) report, the quantitative uncertainty estimates were developed for each of the three major fossil fuels used within each end-use sector; the variations within the sub-fuel types within each end-use sector were not modeled. However, for purposes of assigning uncertainty estimates to the sub-fuel type categories within each end-use sector in the current uncertainty analysis, SAIC/EIA (2001)-reported uncertainty estimates were extrapolated.

⁵² The low emission estimates reported in this section have been rounded down to the nearest integer values and the high emission estimates have been rounded up to the nearest integer values.

with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and emission factor sources and methodology used for estimating CH₄, N₂O, and the greenhouse gas precursors from stationary combustion in the United States. Emission totals for the different sectors and fuels were compared and trends were investigated.

Document 15-20

Recalculations Discussion

EIA (2023a) updated petroleum statistics in coordination with its Petroleum Supply Annual 2021. This impacted the HGL category across the time series.

Fuel consumption data for U.S. Territories provided by EIA's International Energy Statistics (EIA 2023b) was updated across the time series. Non-CO₂ emissions from U.S Territories decreased by an average annual amount of less than 0.01 MMT CO2 Eq. (less than half a percent) for coal and 0.01 MMT CO2 Eq. (5.75 percent) for fuel oil due to the update in fuel consumption data for U.S. Territories.

Wood and natural gas consumption data from EIA's Monthly Energy Review (EIA 2023a) Table 10b was updated, which impacted years 2018-2020. Non-CO₂ emissions across the residential, commercial, industrial, and electric power sectors increased by an average annual amount of less than 0.04 MMT CO₂ Eq. (less than half a percent) for wood and decreased by an average annual amount of 0.03 MMT CO₂ Eq. (less than half a percent) for natural gas due to the update in Monthly Energy Review Table 10b.

In addition, for the current Inventory, CO₂-equivalent emissions of CH₄ and N₂O from stationary combustion have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4), used in previous Inventories (IPCC 2007). The AR5 GWPs have been applied across the entire time series for consistency. Prior inventories used GWP values of 25 and 298 for CH₄ and N₂O, respectively. These values have been updated to 28 and 265, respectively. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO₂-equivalent CH₄ emissions was a 12 percent increase and the average annual change in CO₂-equivalent N₂O emissions was an 11 percent decrease for the time series. As a result of the change in methodology, total emissions across the time series changed by an average annual decrease of 2.3 MMT CO₂ Eq. (6.1 percent) relative to emissions results calculated using the prior GWP values. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Several items are being evaluated to improve the CH₄ and N₂O emission estimates from stationary combustion and to reduce uncertainty for U.S. Territories. Efforts will be taken to work with EIA and other agencies to improve the quality of the U.S. Territories data. Because these data are not broken out by stationary and mobile uses, further research will be aimed at trying to allocate consumption appropriately. In addition, the uncertainty of biomass emissions will be further investigated because it was expected that the exclusion of biomass from the estimates would reduce the uncertainty; and in actuality the exclusion of biomass increases the uncertainty. These improvements are not all-inclusive but are part of an ongoing analysis and efforts to continually improve these stationary combustion estimates from U.S. Territories.

Other forms of biomass-based gas consumption include biogas. As an additional planned improvement, EPA will examine EIA and GHGRP data on biogas collected and burned for energy use and determine if CH₄ and N₂O emissions from biogas can be included in future Inventories. EIA (2023a) natural gas data already deducts biogas used in the natural gas supply, so no adjustments are needed to the natural gas fuel consumption data to account for biogas.

CH₄ and N₂O from Mobile Combustion

Methodology and Time-Series Consistency

Estimates of CH_4 and N_2O emissions from mobile combustion were calculated by multiplying emission factors by measures of activity for each fuel and vehicle type (e.g., light-duty gasoline trucks). Activity data included vehicle miles traveled (VMT) for on-road vehicles and fuel consumption for non-road mobile sources. The activity data and emission factors used in the calculations are described in the subsections that follow. A complete discussion of the methodology used to estimate CH_4 and N_2O emissions from mobile combustion and the emission factors used in the calculations is provided in Annex 3.2.

On-Road Vehicles

Estimates of CH_4 and N_2O emissions from gasoline and diesel on-road vehicles are based on VMT and emission factors (in grams of CH_4 and N_2O per mile) by vehicle type, fuel type, model year, and emission control technology. Emission estimates for alternative fuel vehicles (AFVs) are based on VMT and emission factors (in grams of CH_4 and N_2O per mile) by vehicle and fuel type. ⁵³

CH₄ and N₂O emissions factors by vehicle type and emission tier for newer (starting with model year 2004) on-road gasoline vehicles were calculated by Browning (2019) from annual vehicle certification data compiled by EPA. CH₄ and N₂O emissions factors for older (model year 2003 and earlier) on-road gasoline vehicles were developed by ICF (2004). These earlier emission factors were derived from EPA, California Air Resources Board (CARB) and Environment and Climate Change Canada (ECCC) laboratory test results of different vehicle and control technology types. The EPA, CARB and ECCC tests were designed following the Federal Test Procedure (FTP). The procedure covers three separate driving segments, since vehicles emit varying amounts of greenhouse gases depending on the driving segment. These driving segments are: (1) a transient driving cycle that includes cold start and running emissions, (2) a cycle that represents running emissions only, and (3) a transient driving cycle that includes hot start and running emissions. For each test run, a bag was affixed to the tailpipe of the vehicle and the exhaust was collected; the content of this bag was then analyzed to determine quantities of gases present. The emissions characteristics of driving segment 2 tests were used to define running emissions. Running emissions were subtracted from the total FTP emissions to determine start emissions. These were then recombined to approximate average driving characteristics, based upon the ratio of start to running emissions for each vehicle class from MOBILE6.2, an EPA emission factor model that predicts grams per mile emissions of CO2, CO, HC, NOx, and PM from vehicles under various conditions.54

Diesel on-road vehicle emission factors were developed by ICF (2006a). CH_4 and N_2O emissions factors for newer (starting with model year 2007) on-road diesel vehicles (those using engine aftertreatment systems) were calculated from annual vehicle certification data compiled by EPA.

CH₄ and N₂O emission factors for AFVs were developed based on the 2021 Greenhouse gases, Regulated Emissions, and Energy use in Transportation (GREET) model (ANL 2022). For light-duty trucks, EPA used travel fractions for LDT1 and LDT2 (MOVES Source Type 31 for LDT1 and MOVES Source Type 32 for LDT2; see Annex 3.2 for information about the MOVES model) to determine light-duty truck emission factors. For medium-duty vehicles, EPA used emission factors for light heavy-duty vocational trucks. For heavy-duty vehicles, EPA used emission factors for long-haul combination trucks. For buses, EPA used emission factors for transit buses. These values represent vehicle operations only (tank-to-wheels); upstream well-to-tank emissions are calculated elsewhere in the Inventory. Biodiesel CH₄ emission factors were corrected from GREET values to be the same as

-

⁵³ Alternative fuel and advanced technology vehicles are those that can operate using a motor fuel other than gasoline or diesel. This includes electric or other bi-fuel or dual-fuel vehicles that may be partially powered by gasoline or diesel.

⁵⁴ Additional information regarding the MOBILE model can be found at https://www.epa.gov/moves/description-and-history-mobile-highway-vehicle-emission-factor-model.

CH₄ emission factors for diesel vehicles. GREET overestimated biodiesel CH₄ emission factors based upon an incorrect CH₄-to-THC ratio for diesel vehicles with aftertreatment technology.

Annual VMT data for 1990 through 2021 were obtained from the Federal Highway Administration's (FHWA) Highway Performance Monitoring System database as reported in Highway Statistics (FHWA 1996 through 2023). VMT estimates were then allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model). This corrects time series inconsistencies in FHWA definitions of vehicle types (Browning 2022a). VMT for alternative fuel vehicles (AFVs) were estimated based on Browning (2022b). The age distributions of the U.S. vehicle fleet were obtained from EPA (2004, 2021b), and the average annual age-specific vehicle mileage accumulation of U.S. vehicles were obtained from EPA (2021b).

Control technology and standards data for on-road vehicles were obtained from EPA's Office of Transportation and Air Quality (EPA 2021c, 2021d, and 1998) and Browning (2005). These technologies and standards are defined in Annex 3.2, and were compiled from EPA (1994a, 1994b, 1998, 1999a) and IPCC (2006) sources.

Non-Road Mobile Sources

The nonroad mobile category for CH₄ and N₂O includes ships and boats, aircraft, locomotives, and other mobile non-road sources (e.g., construction or agricultural equipment). For locomotives, aircraft, ships and non-recreational boats, fuel-based emission factors are applied to data on fuel consumption, following the IPCC Tier 1 approach, The Tier 2 approach for these sources would require separate fuel-based emissions factors by technology, for which data are not currently available. For other non-road sources, EPA uses the Nonroad component of the MOVES model to estimate fuel use. Emission factors by horsepower bin are estimated from EPA engine certification data. Because separate emission factors are applied to specific engine technologies; these nonroad sources utilize a Tier 2 approach.

To estimate CH₄ and N₂O emissions from non-road mobile sources, fuel consumption data were employed as a measure of activity and multiplied by fuel-specific emission factors (in grams of N₂O and CH₄ per kilogram of fuel consumed). Activity data were obtained from AAR (2008 through 2022), APTA (2007 through 2022), Rail Inc (2014 through 2022), APTA (2006), BEA (1991 through 2015), Benson (2002 through 2004), DLA Energy (2022), DOC (1991 through 2022), DOE (1993 through 2022), DOT (1991 through 2022), EIA (2002, 2007, 2022), EIA (2022f), EIA (1991 through 2022), EPA (2022b), Esser (2003 through 2004), FAA (2022), FHWA (1996 through 2023), Gaffney (2007), and Whorton (2006 through 2014). Emission factors for non-road modes were taken from IPCC (2006) and Browning (2020a and 2018b).

Uncertainty

A quantitative uncertainty analysis was conducted for the mobile source sector using the IPCC-recommended Approach 2 uncertainty estimation methodology, Monte Carlo Stochastic Simulation technique, using @RISK software. The uncertainty analysis was performed on 2021 estimates of CH₄ and N₂O emissions, incorporating probability distribution functions associated with the major input variables. For the purposes of this analysis, the uncertainty was modeled for the following four major sets of input variables: (1) VMT data, by on-road vehicle and

Energy 3-47

⁵⁵ The consumption of international bunker fuels is not included in these activity data, but emissions related to the consumption of international bunker fuels are estimated separately under the International Bunker Fuels source category.

 $^{^{56}}$ This Inventory uses FHWA's Agriculture, Construction, and Commercial/Industrial MF-24 fuel volumes along with the MOVES model gasoline volumes to estimate non-road mobile source CH_4 and N_2O emissions for these categories. For agriculture, the MF-24 gasoline volume is used directly because it includes both non-road trucks and equipment. For construction and commercial/industrial category gasoline estimates, the 2014 and older MF-24 volumes represented non-road trucks only; therefore, the MOVES gasoline volumes for construction and commercial/industrial categories are added to the respective categories in the Inventory. Beginning in 2015, this addition is no longer necessary since the FHWA updated its methods for estimating on-road and non-road gasoline consumption. Among the method updates, FHWA now incorporates MOVES equipment gasoline volumes in the construction and commercial/industrial categories.

fuel type, (2) emission factor data, by on-road vehicle, fuel, and control technology type, (3) fuel consumption, data, by non-road vehicle and equipment type, and (4) emission factor data, by non-road vehicle and equipment type.

Uncertainty analyses were not conducted for NO_x , CO, or NMVOC emissions. Emission factors for these gases have been extensively researched because emissions of these gases from motor vehicles are regulated in the United States, and the uncertainty in these emission estimates is believed to be relatively low. For more information, see Section 3.11. However, a much higher level of uncertainty is associated with CH_4 and N_2O emission factors due to limited emission test data, and because, unlike CO_2 emissions, the emission pathways of CH_4 and N_2O are highly complex.

Based on the uncertainty analysis, mobile combustion CH_4 emissions from all mobile sources in 2021 were estimated to be between 2.5 and 3.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 4 percent below to 29 percent above the corresponding 2021 emission estimate of 2.6 MMT CO_2 Eq. Mobile combustion N_2O emissions from mobile sources in 2021 were estimated to be between 15.3 and 19.8 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 8 percent below to 19 percent above the corresponding 2021 emission estimate of 16.7 MMT CO_2 Eq.

Table 3-21: Approach 2 Quantitative Uncertainty Estimates for CH₄ and N₂O Emissions from Mobile Sources (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO ₂ Eq.)		ty Range Relat CO₂ Eq.)	ive to Emission Estimate ^a (Percent)		
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	
Mobile Sources	CH ₄	2.6	2.5	3.3	-4%	+29%	
Mobile Sources	N_2O	16.7	15.3	19.8	-8%	+19%	

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

This uncertainty analysis is a continuation of a multi-year process for developing quantitative uncertainty estimates for this source category using the IPCC Approach 2 uncertainty estimation methodology. As a result, as new information becomes available, uncertainty characterization of input variables may be improved and revised. For additional information regarding uncertainty in emission estimates for CH_4 and N_2O please refer to the Uncertainty Annex. As discussed in Annex 5, data are unavailable to include estimates of CH_4 and N_2O emissions from any liquid fuel used in pipeline transport or some biomass used in transportation sources, but those emissions are assumed to be insignificant.

QA/QC and Verification

In order to ensure the quality of the emission estimates from mobile combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The specific plan used for mobile combustion was updated prior to collection and analysis of this current year of data. The Tier 2 procedures focused on the emission factor and activity data sources, as well as the methodology used for estimating emissions. These procedures included a qualitative assessment of the emission estimates to determine whether they appear consistent with the most recent activity data and emission factors available. A comparison of historical emissions between the current Inventory and the previous Inventory was also conducted to ensure that the changes in estimates were consistent with the changes in activity data and emission factors.

Recalculations Discussion

In previous inventories, on-highway greenhouse gas emissions were calculated using FHWA fuel consumption and vehicle miles traveled (VMT) data delineated by FHWA vehicle classes. These fuel consumption estimates were then combined with estimates of fuel shares by vehicle type from Oak Ridge National Laboratory's Transportation Energy Data Book (TEDB), to develop an estimate of fuel consumption for each vehicle type in the Inventory (i.e.,

passenger cars, light-duty trucks, buses, medium- and heavy-duty trucks, motorcycles). However, in 2011, FHWA changed its methods for estimating VMT and related data. These methodological changes included how vehicles are classified, moving from a system based on body-type to one that is based on wheelbase. These changes were first incorporated in the 1990 through 2008 Inventory and applied to the time series beginning in 2007. The FHWA methodology update resulted in large changes in VMT and fuel consumption by vehicle class, leading to a shift in emissions among vehicle classes. For example, FHWA replaced the vehicle category "Passenger Cars" with "Lightduty Vehicles-Short Wheelbase" and the "Other 2 axle-4 Tire Vehicles" category was replaced by "Light-duty Vehicles, Long Wheelbase." FHWA changed the definition of light-duty vehicles to less than 10,000 lbs. GVWR instead of 8,500 lbs. GVWR pushed some single-unit heavy-duty trucks to the light-duty class. This change in vehicle classification also moved some smaller trucks and sport utility vehicles from the light truck category to the passenger cars category in this Inventory. These updates resulted in a disconnect in FHWA VMT and fuel consumption data in the 2006 to 2007 timeframe, generating a large drop in the light-duty truck VMT and fuel consumption trend lines between 2006 and 2007, and a corresponding increase in the passenger cars trend lines.

To address this inconsistency in the time series, EPA updated the methodology to divide FHWA VMT data into vehicle classes and fuel type using distributions from EPA's Motor Vehicle Emission Simulator, MOVES. The MOVES model is a nationally recognized model based on vehicle registration, travel activity, and emission rates that are updated with each model release. MOVES3 is the latest version of MOVES and uses forecast growth factors which provide EPA's best estimate of likely future activity based on historical data (see Annex 3.2 for more information about the MOVES model). Thus, dividing FHWA total VMT data into vehicle class and fuel type using MOVES3 ratios provides a more consistent estimate of vehicle activity over the Inventory time series. MOVES3 ratios are also used to reallocate FHWA gasoline and diesel fuel use data (Browning 2022a). For this update, the MOVES3 model was run for calendar years 1990 and 1999 through 2021 for all vehicle types. Calendar years 1991 through 1998 were linearly interpolated from 1990 and 1999 calendar year MOVES3 outputs. Model outputs of VMT and fuel consumption were binned by calendar year, MOVES vehicle type, and fuel type; MOVES vehicle types were then mapped to the vehicle types used in the Inventory. Only outputs of gasoline and diesel fuel consumption from MOVES3 were used; alternative fuel VMT and fuel consumption outputs are ignored because they are calculated for the Inventory under a separate methodology. Total gasoline and diesel fuel consumption values from FHWA were then allocated to Inventory vehicle types using gasoline and diesel fuel consumption ratios by vehicle type from MOVES3. Similarly, VMT by vehicle type and fuel type was calculated by multiplying the total VMT from FHWA by VMT ratios by vehicle and fuel type generated by MOVES3. Overall, because total fuel consumption and VMT values are conserved, the changes in total emissions are small, within 0.1 percent. Observed differences in total emissions are due to changes in CH₄ and N₂O emissions, as the methodology for calculating these non-CO₂ emissions utilizes more detailed activity data and is therefore sensitive to the re-allocation of activity data. While total emissions estimates are not significantly impacted by this methodology update, there are significant changes in the allocation of emissions by vehicle type. The share of emissions allocated to passenger cars now generally decline through the time series while the share of emissions allocated to light-duty trucks increase over time.

In addition, the methodology for estimating emissions from alternative fuel vehicles was revised. In previous Inventories, EPA used Energy Information Administration (EIA) surveys of fleet vehicles used by electricity providers, federal agencies, natural gas providers, propane providers, state agencies and transit agencies to determine fuel use and vehicle counts for most alternative fuel vehicles. However, EIA stopped conducting these surveys in 2017. To address this data void, EPA used various methods to determine vehicle counts. Beginning with the 1990 through 2018 Inventory, electric, plug-in electric, and fuel cell vehicle counts were determined from vehicles sales data published by Wards Intelligence. Beginning with this Inventory, electric and fuel cell heavy-duty bus counts are determined from Zukowski, D. (2022) for calendar years 2018 through 2021. Vehicle counts for other fuels (methanol, ethanol, natural gas, and LPG) for 2018 onward were estimated via regression analysis (Browning 2022b).

In addition, the latest version of Argonne National Laboratory's Greenhouse Gas, Regulated Emissions, and Energy Use in Transportation Model (GREET2022) provided updated emission factors for all alternative fuel vehicle classes (ANL 2022). Updated emission factors from GREET2022 were implemented in this Inventory, across the entire time series.

The updated vehicle counts and emission factors resulted in a 16 percent reduction in CO₂, a 51 percent reduction in CH₄, and a 92 percent reduction in N₂O in calendar year 2020 for alternative fuel vehicles compared with the previous methodology. This resulted in a 21 percent overall reduction in CO₂ Eq. for alternative fuel vehicles compared with the previous methodology.

In addition, for the current Inventory, CO₂-equivalent estimates of CH₄ and N₂O emissions from transportation and mobile combustion have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWP values have been applied across the entire time series for consistency.

The GWP of CH₄ increased, leading to an overall increase in CH₄ emissions reported in CO₂ equivalent. The GWP of N2O decreased, leading to a decrease in emissions from N2O reported in CO2 equivalent. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO₂-equivalent CH₄ emissions was a 12 percent increase and the average annual change in CO₂-equivalent N₂O emissions was 11 percent decrease for the time series. The net impact from these updates was an average annual 0.1 percent decrease in total CO₂ Eq. emissions for the time series in recent years. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

While the data used for this report represent the most accurate information available, several areas for improvement have been identified.

- Update emission factors for ships and non-recreational boats using residual fuel and distillate fuel. Develop emission factors for locomotives using ultra low sulfur diesel and emission factors for aircraft using jet fuel. The Inventory currently uses IPCC default values for these emission factors.
- Continue to explore potential improvements to estimates of domestic waterborne fuel consumption for future Inventories. The Inventory estimates for residual and distillate fuel used by ships and boats is based in part on data on bunker fuel use from the U.S. Department of Commerce. Domestic fuel consumption is estimated by subtracting fuel sold for international use from the total sold in the United States. Since 2015, all ships travelling within 200 nautical miles of the U.S. coastlines must use distillate fuels thereby overestimating the residual fuel used by U.S. vessels and underestimating distillate fuel use in these ships.

Carbon Emitted from Non-Energy Uses of Fossil Fuels (CRF Source Category 1A)

In addition to being combusted for energy, fossil fuels are also consumed for non-energy uses (NEU) in the United States. The fuels used for these purposes are diverse, including natural gas, hydrocarbon gas liquids (HGL), 57 asphalt (a viscous liquid mixture of heavy crude oil distillates), petroleum coke (manufactured from heavy oil), and

⁵⁷ HGL (formerly referred to as liquefied petroleum gas, or LPG) are hydrocarbons that occur as gases at atmospheric pressure and as liquids under higher pressures. HGLs include paraffins, such as ethane, propane, butanes, isobutane, and natural gasoline (formerly referred to as pentanes plus), and HGLs include olefins, such as ethylene, propylene, butylene and isobutylene.

coal (metallurgical) coke (manufactured from coking coal). The non-energy applications of these fuels are equally diverse, including feedstocks for the manufacture of plastics, rubber, synthetic fibers and other materials; reducing agents for the production of various metals and inorganic products; and products such as lubricants, waxes, and asphalt (IPCC 2006). Emissions from non-energy use of lubricants, paraffin waxes, bitumen/asphalt, and solvents are reported in the Energy sector, as opposed to the Industrial Processes and Product Use (IPPU) sector, to reflect national circumstances in its choice of methodology and to increase transparency of this source category's unique country-specific data sources and methodology (see Box 3-5). In addition, estimates of non-energy use emissions included here do not include emissions already reflected in the IPPU sector, e.g., fuels used as reducing agents. To avoid double counting, the "raw" non-energy fuel consumption data reported by EIA are reduced to account for these emissions already included under IPPU.

Carbon dioxide emissions arise from non-energy uses via several pathways. Emissions may occur during the manufacture of a product, as is the case in producing plastics or rubber from fuel-derived feedstocks. Additionally, emissions may occur during the product's lifetime, such as during solvent use. Overall, throughout the time series and across all uses, about 62 percent of the total C consumed for non-energy purposes was stored in products (e.g., plastics), and not released to the atmosphere; the remaining 38 percent was emitted.

There are several areas in which non-energy uses of fossil fuels are closely related to other parts of this Inventory. For example, some of the non-energy use products release CO2 at the end of their commercial life when they are combusted after disposal; these emissions are reported separately within the Energy chapter in the Incineration of Waste source category. There are also net exports of petrochemical intermediate products that are not completely accounted for in the EIA data, and the Inventory calculations adjust for the effect of net exports on the mass of C in non-energy applications.

As shown in Table 3-22, fossil fuel emissions in 2021 from the non-energy uses of fossil fuels were 140.2 MMT CO₂ Eq., which constituted approximately 2.8 percent of overall fossil fuel emissions. In 2021, the consumption of fuels for non-energy uses (after the adjustments described above) was 5,902.4 TBtu (see Table 3-23). A portion of the C in the 5,902.4 TBtu of fuels was stored (234.0 MMT CO₂ Eq.), while the remaining portion was emitted (140.2 MMT CO₂ Eq.). Non-energy use emissions increased by 17.6 percent from 2020 to 2021, mainly due to an increase in HGL and industrial coking coal fuel consumption, which contributed 14.0 MMT CO₂ Eq. to the increase in emissions from 2020 to 2021. Although a rise in consumption of some fuels was potentially due to a bounce back in production following the early effects of the COVID-19 pandemic (e.g., naphtha and special naphtha production returned closer to pre-2020 levels), the overall increase in 2021 emissions for select industries exceeds prepandemic levels. See Annex 2.3 for more details.

Table 3-22: CO₂ Emissions from Non-Energy Use Fossil Fuel Consumption (MMT CO₂ Eq. and Percent C)

Year	1990	2005	2017	2018	2019	2020	2021
Potential Emissions	305.8	366.9	332.4	352.6	355.9	350.2	374.2
C Stored	193.4	238.0	219.6	223.2	228.2	231.0	234.0
Emissions as a % of Potential	37%	35%	34%	37%	36%	34%	37%
C Emitted	112.4	128.9	112.8	129.4	127.6	119.2	140.2

Note: NEU emissions presented in this table differ from the NEU emissions presented in CRF table 1.A(a)s4 as the CRF NEU emissions do not include NEU of lubricants and other petroleum in U.S. Territories. NEU emissions from U.S. Territories are reported under U.S. Territories in the CRF table 1.A(a)s4.

Methodology and Time-Series Consistency

The first step in estimating C stored in products was to determine the aggregate quantity of fossil fuels consumed for non-energy uses. The C content of these feedstock fuels is equivalent to potential emissions, or the product of consumption and the fuel-specific C content values. Both the non-energy fuel consumption and C content data were supplied by the EIA (2023) (see Annex 2.1). Consumption values for industrial coking coal, petroleum coke, other oils, and natural gas in Table 3-23 and Table 3-24 have been adjusted to subtract non-energy uses that are

For the remaining non-energy uses, the quantity of C stored was estimated by multiplying the potential emissions by a storage factor.

- For several fuel types—petrochemical feedstocks (including natural gas for non-fertilizer uses, HGL, naphthas, other oils, still gas, special naphtha, and industrial other coal), asphalt and road oil, lubricants, and waxes—U.S. data on C stocks and flows were used to develop C storage factors, calculated as the ratio of (a) the C stored by the fuel's non-energy products to (b) the total C content of the fuel consumed. A lifecycle approach was used in the development of these factors in order to account for losses in the production process and during use. Because losses associated with municipal solid waste management are handled separately in the Energy sector under the Incineration of Waste source category, the storage factors do not account for losses at the disposal end of the life cycle.
- For industrial coking coal and distillate fuel oil, storage factors were taken from Marland and Rotty (1984).
- For the remaining fuel types (petroleum coke, miscellaneous products and other petroleum), IPCC (2006)
 does not provide guidance on storage factors, and assumptions were made based on the potential fate of
 C in the respective non-energy use products. Carbon dioxide emissions from carbide production are
 implicitly accounted for in the storage factor calculation for the non-energy use of petroleum coke.

Table 3-23: Adjusted Consumption of Fossil Fuels for Non-Energy Uses (TBtu)

Year	1990	2005	2017	2018	2019	2020	2021
Industry	4,317.8	5,115.1	5,089.8	5,448.0	5,484.1	5,444.8	5,780.2
Industrial Coking Coal	NO	80.4	113.0	124.7	112.8	70.0	124.6
Industrial Other Coal	7.6	11.0	9.5	9.5	9.5	9.5	9.5
Natural Gas to Chemical Plants	282.4	260.9	588.0	676.4	667.6	663.3	667.3
Asphalt & Road Oil	1,170.2	1,323.2	849.2	792.8	843.9	832.3	898.1
HGL ^a	1,218.0	1,610.1	2,193.7	2,506.9	2,550.7	2,658.0	2,819.6
Lubricants	186.3	160.2	124.9	122.0	118.3	111.1	113.9
Natural Gasoline ^b	117.5	95.4	81.7	105.3	155.0	163.7	202.4
Naphtha (<401 °F)	327.0	679.5	413.0	421.2	369.5	329.4	331.1
Other Oil (>401 °F)	663.6	499.5	242.9	219.1	212.1	195.6	196.3
Still Gas	36.7	67.7	163.8	166.9	158.7	145.4	152.8
Petroleum Coke	29.1	104.2	NO	NO	NO	NO	0.0
Special Naphtha	101.1	60.9	95.3	87.0	89.5	80.8	76.1
Distillate Fuel Oil	7.0	16.0	5.8	5.8	5.8	5.8	5.8
Waxes	33.3	31.4	10.2	12.4	10.4	9.2	11.8
Miscellaneous Products	137.8	112.8	198.8	198.0	180.2	170.7	170.8
Transportation	176.0	151.3	142.0	137.0	131.3	115.6	118.6
Lubricants	176.0	151.3	142.0	137.0	131.3	115.6	118.6
U.S. Territories	50.8	114.9	3.5	3.6	3.6	3.6	3.6
Lubricants	0.7	4.6	1.0	1.0	1.0	1.0	1.0
Other Petroleum (Misc. Prod.)	50.1	110.3	2.4	2.5	2.6	2.6	2.6
Total	4,544.6	5,379.4	5,235.3	5,588.5	5,619.1	5,564.0	5,902.4

⁵⁸ These source categories include Iron and Steel Production, Lead Production, Zinc Production, Ammonia Manufacture, Carbon Black Manufacture (included in Petrochemical Production), Titanium Dioxide Production, Ferroalloy Production, Silicon Carbide Production, and Aluminum Production.

NO (Not Occurring)

Table 3-24: 2021 Adjusted Non-Energy Use Fossil Fuel Consumption, Storage, and Emissions

	Adjusted						
	Non-Energy	Carbon Content	Potential	Storage	Carbon	Carbon	Carbon
	Usea	Coefficient	Carbon	Factor	Stored	Emissions	Emissions
Sector/Fuel Type	(TBtu)	(MMT C/QBtu)	(MMT C)		(MMT C)	(MMT C)	(MMT CO ₂ Eq.)
Industry	5,780.2	NA	99.6	NA	63.6	36.0	132.0
Industrial Coking Coal	124.6	25.60	3.2	0.10	0.3	2.9	10.5
Industrial Other Coal	9.5	26.10	0.2	0.59	0.1	0.1	0.4
Natural Gas to							
Chemical Plants	667.3	14.47	9.6	0.59	5.7	3.9	14.4
Asphalt & Road Oil	898.1	20.55	18.5	1.00	18.4	0.1	0.3
HGL ^b	2,819.6	16.83	47.4	0.59	28.0	19.4	71.1
Lubricants	113.9	20.20	2.3	0.09	0.2	2.1	7.7
Natural Gasoline ^c	202.4	18.24	3.7	0.59	2.2	1.5	5.5
Naphtha (<401° F)	331.1	18.55	6.1	0.59	3.6	2.5	9.2
Other Oil (>401° F)	196.3	20.17	4.0	0.59	2.3	1.6	5.9
Still Gas	152.8	17.51	2.7	0.59	1.6	1.1	4.0
Petroleum Coke	0.0	27.85	0.0	0.30	0.0	0.0	0.0
Special Naphtha	76.1	19.74	1.5	0.59	0.9	0.6	2.3
Distillate Fuel Oil	5.8	20.22	0.1	0.50	0.1	0.1	0.2
Waxes	11.8	19.80	0.2	0.58	0.1	0.1	0.4
Miscellaneous							
Products	170.8	0.00	0.0	0.00	0.0	0.0	0.0
Transportation	118.6	NA	2.4	NA	0.2	2.2	8.0
Lubricants	118.6	20.20	2.4	0.09	0.2	2.2	8.0
U.S. Territories	3.6	NA	0.1	NA	0.0	0.1	0.2
Lubricants	1.0	20.20	0.0	0.09	0.0	0.0	0.1
Other Petroleum							
(Misc. Prod.)	2.6	20.00	0.1	0.10	0.0	0.0	0.2
Total	5,902.4		102.1		63.8	38.2	140.2

⁺ Does not exceed 0.05 TBtu, MMT C, or MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Lastly, emissions were estimated by subtracting the C stored from the potential emissions (see Table 3-22). More detail on the methodology for calculating storage and emissions from each of these sources is provided in Annex 2.3.

Where storage factors were calculated specifically for the United States, data were obtained on (1) products such as asphalt, plastics, synthetic rubber, synthetic fibers, cleansers (soaps and detergents), pesticides, food additives, antifreeze and deicers (glycols), and silicones; and (2) industrial releases including energy recovery (waste gas from chemicals), Toxics Release Inventory (TRI) releases, hazardous waste incineration, and volatile organic compound, solvent, and non-combustion CO emissions. Data were taken from a variety of industry sources, government reports, and expert communications. Sources include EPA reports and databases such as compilations of air

^a Excludes natural gasoline.

^b Formerly referred to as "Pentanes Plus." This source has been adjusted and is reported separately from HGL to align with historic data and revised EIA terminology.

NA (Not Applicable)

NO (Not Occurring)

^a To avoid double counting, net exports have been deducted.

^b Excludes natural gasoline.

^c Formerly referred to as "Pentanes Plus." This source has been adjusted and is reported separately from HGL to align with historic data and revised EIA terminology.

emission factors (EPA 2001), *National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data* (EPA 2022), *Toxics Release Inventory, 1998* (EPA 2000b), *Biennial Reporting System* (EPA 2000a, 2009), *Resource Conservation and Recovery Act Information System* (EPA 2013b, 2015, 2016b, 2018b, 2021), pesticide sales and use estimates (EPA 1998, 1999, 2002, 2004, 2011, 2017), and the Chemical Data Access Tool (EPA 2014b); the EIA Manufacturer's Energy Consumption Survey (MECS) (EIA 1994, 1997, 2001, 2005, 2010, 2013, 2017, 2021); the National Petrochemical & Refiners Association (NPRA 2002); the U.S. Census Bureau (1999, 2004, 2009, 2014, 2021); Bank of Canada (2012, 2013, 2014, 2016, 2017, 2018, 2019, 2020, 2021, 2022); Financial Planning Association (2006); INEGI (2006); the United States International Trade Commission (2022); Gosselin, Smith, and Hodge (1984); EPA's *Municipal Solid Waste (MSW) Facts and Figures* (EPA 2013, 2014a, 2016a, 2018a, 2019); the U.S. Tire Manufacturers Association (USTMA2012, 2013, 2014, 2016, 2018, 2020, 2022); the International Institute of Synthetic Rubber Products (IISRP 2000, 2003); the Fiber Economics Bureau (FEB 2001, 2003, 2005, 2007, 2009, 2010, 2011, 2012, 2013); the Independent Chemical Information Service (ICIS 2008, 2016); the EPA Chemical Data Access Tool (CDAT) (EPA 2014b); the American Chemistry Council (ACC 2003 through 2011, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022a); the *Guide to the Business of Chemistry* (ACC 2022b); and the Chemistry Industry Association of Canada (CIAC 2022). Specific data sources are listed in full detail in Annex 2.3.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021 as discussed below.

Box 3-5: Reporting of Lubricants, Waxes, and Asphalt and Road Oil Product Use in Energy Sector

IPCC (2006) provides methodological guidance to estimate emissions from the first use of fossil fuels as a product for primary purposes other than combustion for energy purposes (including lubricants, paraffin waxes, bitumen / asphalt, and solvents) under the IPPU sector. ⁵⁹ In this Inventory, C storage and C emissions from product use of lubricants, waxes, and asphalt and road oil are reported under the Energy sector in the Carbon Emitted from Non-Energy Uses of Fossil Fuels source category (CRF Source Category 1A5). ⁶⁰

The emissions are reported in the Energy sector, as opposed to the IPPU sector, to reflect national circumstances in its choice of methodology and to increase transparency of this source category's unique country-specific data sources and methodology. Although emissions from these non-energy uses are reported in the Energy chapter the methodologies used to determine emissions are compatible with the 2006 IPCC Guidelines. The country-specific methodology used for the Carbon Emitted from Non-Energy Uses of Fossil Fuels source category is based on a carbon balance (i.e., C inputs-outputs) calculation of the aggregate amount of fossil fuels used for non-energy uses, including inputs of lubricants, waxes, asphalt and road oil (see Table 3-24).

For those inputs, U.S. country-specific data on C stocks and flows are used to develop carbon storage factors, which are calculated as the ratio of the C stored by the fossil fuel non-energy products to the total C content of the fuel consumed, taking into account losses in the production process and during product use. ⁶¹ The country-specific methodology to reflect national circumstances starts with the aggregate amount of fossil fuels used for non-energy uses and applies a C balance calculation, breaking out the C emissions from non-energy use of lubricants, waxes, and asphalt and road oil. The emissions are reported under the Energy chapter to improve transparency, report a more complete carbon balance and to avoid double counting. Due to U.S. national circumstances, reporting these C emissions separately under IPPU would involve making artificial adjustments to allocate both the C inputs and C outputs of the non-energy use C balance. For example, only the emissions from the first use of lubricants and waxes are to be reported under the IPPU sector, emissions from use of lubricants in 2-stroke engines and emissions from secondary use of lubricants and waxes in waste incineration

3-54 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁵⁹ See for example Volume 3: Industrial Processes and Product Use, and Chapter 5: Non-Energy Products from Fuels and Solvent Use of the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006).

⁶⁰ Non-methane volatile organic compound (NMVOC) emissions from solvent use are reported separately in the IPPU sector, following Chapter 5 of the *2006 IPCC Guidelines*.

⁶¹ Data and calculations for lubricants and waxes and asphalt and road oil are in Annex 2.3 – Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels.

with energy recovery are to be reported under the Energy sector. Reporting these non-energy use emissions from only first use of lubricants and waxes under IPPU would involve making artificial adjustments to the non-energy use C carbon balance and could potentially result in double counting of emissions. These artificial adjustments would also be required for asphalt and road oil and solvents (which are captured as part of petrochemical feedstock emissions) and could also potentially result in double counting of emissions. To avoid presenting an incomplete C balance and a less transparent approach for the Carbon Emitted from Non-Energy Uses of Fossil Fuels source category calculation, the entire calculation of C storage and C emissions is therefore conducted in the Non-Energy Uses of Fossil Fuels category calculation methodology, and both the C storage and C emissions for lubricants, waxes, and asphalt and road oil are reported under the Energy sector.

However, emissions from non-energy uses of fossil fuels as feedstocks or reducing agents (e.g., petrochemical production, aluminum production, titanium dioxide, and zinc production) are reported in the IPPU chapter, unless otherwise noted due to specific national circumstances.

Uncertainty

An uncertainty analysis was conducted to quantify the uncertainty surrounding the estimates of emissions and storage factors from non-energy uses. This analysis, performed using @RISK software and the IPCC-recommended Approach 2 methodology (Monte Carlo Stochastic Simulation technique), provides for the specification of probability density functions for key variables within a computational structure that mirrors the calculation of the inventory estimate. The results presented below provide the 95 percent confidence interval, the range of values within which emissions are likely to fall, for this source category.

As noted above, the non-energy use analysis is based on U.S.-specific storage factors for (1) feedstock materials (natural gas, HGL, natural gasoline, naphthas, other oils, still gas, special naphthas, and other industrial coal), (2) asphalt, (3) lubricants, and (4) waxes. For the remaining fuel types (the "other" category in Table 3-23 and Table 3-24) the storage factors were taken directly from IPCC (2006), where available, and otherwise assumptions were made based on the potential fate of carbon in the respective NEU products. To characterize uncertainty, five separate analyses were conducted, corresponding to each of the five categories. In all cases, statistical analyses or expert judgments of uncertainty were not available directly from the information sources for all the activity variables; thus, uncertainty estimates were determined using assumptions based on source category knowledge.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-25 (emissions) and Table 3-26 (storage factors). Carbon emitted from non-energy uses of fossil fuels in 2021 was estimated to be between 81.3 and 204.4 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 42 percent below to 46 percent above the 2021 emission estimate of 140.2 MMT CO_2 Eq. The uncertainty in the emission estimates is a function of uncertainty in both the quantity of fuel used for non-energy purposes and the storage factor.

Table 3-25: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Non-Energy Uses of Fossil Fuels (MMT CO₂ Eq. and Percent)

Carras	6	2021 Emission Estimate	Uncertain	ty Range Relat	ive to Emissio	n Estimate ^a	
Source	Gas	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)		
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	
Feedstocks	CO ₂	112.9	58.5	179.9	-48%	+59%	
Asphalt	CO_2	0.3	0.1	0.7	-59%	+118%	
Lubricants	CO_2	15.7	13.0	18.2	-17%	+16%	
Waxes	CO_2	0.4	0.3	0.7	-24%	+84%	
Other	CO_2	10.9	2.1	12.7	-81%	+17%	
Total	CO ₂	140.2	81.3	204.4	-42%	+46%	

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Note: Totals may not sum due to independent rounding.

Table 3-26: Approach 2 Quantitative Uncertainty Estimates for Storage Factors of Non-Energy Uses of Fossil Fuels (Percent)

6	0	2021 Storage Factor	Uncertainty Range Relative to Emission Estimatea							
Source	Gas	(%)	(9	%)	(%, Relative)					
			Lower Upper		Lower	Upper				
			Bound	Bound	Bound	Bound				
Feedstocks	CO ₂	59.1%	46.7%	72.8%	-21%	+23%				
Asphalt	CO_2	99.6%	99.1%	99.8%	-0.5%	+0.3%				
Lubricants	CO_2	9.2%	4.0%	17.4%	-57%	+90%				
Waxes	CO_2	57.8%	47.4%	67.4%	-18%	+17%				
Other	CO_2	11.4%	6.6%	82.8%	-42%	+626%				

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval, as a percentage of the inventory value (also expressed in percent terms).

As shown in Table 3-26, waxes and asphalt contribute least to overall storage factor uncertainty on a percentage basis. Although the feedstocks category—the largest use category in terms of total carbon flows—also appears to have relatively tight confidence limits, this is to some extent an artifact of the way the uncertainty analysis was structured. As discussed in Annex 2.3, the storage factor for feedstocks is based on an analysis of six fates that result in long-term storage (e.g., plastics production), and eleven that result in emissions (e.g., volatile organic compound emissions). Rather than modeling the total uncertainty around all of these fate processes, the current analysis addresses only the storage fates, and assumes that all C that is not stored is emitted. As the production statistics that drive the storage values are relatively well-characterized, this approach yields a result that is probably biased toward understating uncertainty.

As is the case with the other uncertainty analyses discussed throughout this document, the uncertainty results above address only those factors that can be readily quantified. More details on the uncertainty analysis are provided in Annex 2.3.

QA/QC and Verification

In order to ensure the quality of the emission estimates from non-energy uses of fossil fuels, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. This effort included a general analysis, as well as portions of a category specific analysis for non-energy uses involving petrochemical feedstocks and for imports and exports. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and methodology for estimating the fate of C (in terms of storage and emissions) across the various end-uses of fossil C. Emission and storage totals for the different subcategories were compared, and trends across the time series were analyzed to determine whether any corrective actions were needed. Corrective actions were taken to rectify minor errors and to improve the transparency of the calculations, facilitating future QA/QC.

For petrochemical import and export data, special attention was paid to NAICS numbers and titles to verify that none had changed or been removed. Import and export totals were compared with 2020 totals as well as their trends across the time series.

It is important to ensure no double counting of emissions between fuel combustion, non-energy use of fuels and industrial process emissions. For petrochemical feedstock production, our review of the categories suggests this is not a significant issue since the non-energy use industrial release data includes different categories of sources and sectors than those included in the Industrial Processes and Product Use (IPPU) emissions category for petrochemicals. Further data integration is not available at his time because feedstock data from the EIA used to estimate non-energy uses of fuels are aggregated by fuel type, rather than disaggregated by both fuel type and

particular industries. Also, GHGRP-reported data on quantities of fuel consumed as feedstocks by petrochemical producers are unable to be used due to the data failing GHGRP CBI aggregation criteria.

Recalculations Discussion

Several updates to activity data factors lead to recalculations of previous year results. The major updates are as follows:

- ACC (2022b) updated polyester, polyolefin and nylon fiber, ethylene glycol, maleic anhydride, adipic acid, and acetic acid production in 2020, which resulted in a slight decrease in emissions relative to the previous Inventory.
- U.S. International Trade Commission (2022) updated historical import and export data from 1996 to 2020, resulting in fewer net exports relative to the previous Inventory.
- Updates to the petrochemical feedstock production and stocks led to an increase to the annually variable storage factor from 1996 to 2020 for feedstocks, leading to less carbon emitted and a decrease in emissions, most notably from HGL.
- CIAC (2022) revised shipments for years 2017 to 2020, which resulted in a slight increase in emissions from plastics from 2017 to 2020.

Overall, these changes resulted in an average annual decrease of 0.2 MMT CO₂ Eq. (0.2 percent) in carbon emissions from non-energy uses of fossil fuels for the period 1990 through 2020, relative to the previous Inventory.

Planned Improvements

There are several future improvements planned:

- More accurate accounting of C in petrochemical feedstocks. EPA has worked with EIA to determine the cause of input/output discrepancies in the C mass balance contained within the NEU model. In the future, two strategies to reduce or eliminate this discrepancy will continue to be pursued as part of quality control procedures. First, accounting of C in imports and exports will be improved. The import/export adjustment methodology will be examined to ensure that net exports of intermediaries such as ethylene and propylene are fully accounted for. Second, the use of top-down C input calculation in estimating emissions will be reconsidered. Alternative approaches that rely more substantially on the bottom-up C output calculation will be considered instead.
- Improving the uncertainty analysis. Most of the input parameter distributions are based on professional judgment rather than rigorous statistical characterizations of uncertainty.
- Better characterizing flows of fossil C. Additional fates may be researched, including the fossil C load in organic chemical wastewaters, plasticizers, adhesives, films, paints, and coatings. There is also a need to further clarify the treatment of fuel additives and backflows (especially methyl tert-butyl ether, MTBE).
- Reviewing the trends in fossil fuel consumption for non-energy uses. Annual consumption for several fuel types is highly variable across the time series, including industrial coking coal and other petroleum. A better understanding of these trends will be pursued to identify any mischaracterized or misreported fuel consumption for non-energy uses.
- Updating the average C content of solvents was researched, since the entire time series depends on one year's worth of solvent composition data. The data on C emissions from solvents that were readily available do not provide composition data for all categories of solvent emissions and also have conflicting definitions for volatile organic compounds, the source of emissive C in solvents. Additional sources of solvents data will be investigated in order to update the C content assumptions.

- Updating the average C content of cleansers (soaps and detergents) was researched; although production and consumption data for cleansers are published every 5 years by the Census Bureau, the composition (C content) of cleansers has not been recently updated. Recently available composition data sources may facilitate updating the average C content for this category.
- Revising the methodology for consumption, production, and C content of plastics was researched; because of recent changes to the type of data publicly available for plastics, the NEU model for plastics applies data obtained from personal communications. Potential revisions to the plastics methodology to account for the recent changes in published data will be investigated.
- Although U.S.-specific storage factors have been developed for feedstocks, asphalt, lubricants, and waxes, default values from IPCC are still used for two of the non-energy fuel types (industrial coking coal, distillate oil), and broad assumptions are being used for miscellaneous products and other petroleum. Over the long term, there are plans to improve these storage factors by analyzing C fate similar to those described in Annex 2.3 or deferring to more updated default storage factors from IPCC where available.
- Reviewing the storage of carbon black across various sectors in the Inventory; in particular, the carbon black abraded and stored in tires.
- Assess the current method and/or identify new data sources (e.g., EIA) for estimating emissions from ammonia/fertilizer use of natural gas.
- Investigate EIA NEU and MECS data to update, as needed, adjustments made for ammonia production and "natural gas to chemical plants, other uses" and "natural gas to other" non-energy uses, including iron and steel production, in energy uses and IPPU.

Incineration of Waste (CRF Source 3.3 Category 1A5)

Combustion is used to manage about 7 to 19 percent of the solid wastes generated in the United States, depending on the source of the estimate and the scope of materials included in the definition of solid waste (EPA 2000; EPA 2020; Goldstein and Madtes 2001; Kaufman et al. 2004; Simmons et al. 2006; van Haaren et al. 2010). In the context of this section, waste includes all municipal solid waste (MSW) as well as scrap tires. In the United States, combustion of MSW tends to occur at waste-to-energy facilities or industrial facilities where useful energy is recovered, and thus emissions from waste combustion are accounted for in the Energy chapter. Similarly, scrap tires are combusted for energy recovery in industrial and utility boilers, pulp and paper mills, and cement kilns. Combustion of waste results in conversion of the organic inputs to CO2. According to the 2006 IPCC Guidelines, when the CO_2 emitted is of fossil origin, it is counted as a net anthropogenic emission of CO_2 to the atmosphere. Thus, the emissions from waste combustion are calculated by estimating the quantity of waste combusted and the fraction of the waste that is C derived from fossil sources.

Most of the organic materials in MSW are of biogenic origin (e.g., paper, yard trimmings), and have their net C flows accounted for under the Land Use, Land-Use Change, and Forestry chapter. However, some components of MSW and scrap tires—plastics, synthetic rubber, synthetic fibers, and carbon black—are of fossil origin. Plastics in the U.S. waste stream are primarily in the form of containers, packaging, and durable goods. Rubber is found in durable goods, such as carpets, and in non-durable goods, such as clothing and footwear. Fibers in MSW are predominantly from clothing and home furnishings. As noted above, scrap tires (which contain synthetic rubber and carbon black) are also considered a "non-hazardous" waste and are included in the waste combustion estimate, though waste disposal practices for tires differ from MSW. Estimates on emissions from hazardous waste combustion can be found in Annex 2.3 and are accounted for as part of the C mass balance for non-energy uses of fossil fuels.

Approximately 27.9 million metric tons of MSW were combusted in 2021 (EPA 2021). Carbon dioxide emissions from combustion of waste decreased 3.3 percent since 1990, to an estimated 12.5 MMT CO₂ (12,476 kt) in 2021. Emissions across the time series are shown in Table 3-27 and Table 3-28. Waste combustion is also a source of CH₄ and N₂O emissions (De Soete 1993; IPCC 2006). Methane emissions from the combustion of waste were estimated to be less than 0.05 MMT CO₂ Eq. (less than 0.05kt CH₄) in 2021 and have remained steady since 1990. Nitrous oxide emissions from the combustion of waste were estimated to be 0.4 MMT CO₂ Eq. (1.3 kt N₂O) in 2021 and have decreased by 13 percent since 1990. This decrease is driven by the decrease in total MSW combusted.

Table 3-27: CO₂, CH₄, and N₂O Emissions from the Combustion of Waste (MMT CO₂ Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	12.9	13.3	13.2	13.3	12.9	12.9	12.5
CH ₄	+	+	+	+	+	+	+
N_2O	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Total	13.3	13.6	13.5	13.7	13.3	13.3	12.8

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 3-28: CO₂, CH₄, and N₂O Emissions from the Combustion of Waste (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	12,900	13,254	13,161	13,339	12,948	12,921	12,476
CH ₄	+	+	+	+	+	+	+
N_2O	2	1	1	1	1	1	1

⁺ Does not exceed 0.05 kt.

Methodology and Time-Series Consistency

Municipal Solid Waste Combustion

To determine both CO₂ and non-CO₂ emissions from the combustion of waste, the tonnage of waste combusted and an estimated emissions factor are needed. Emission estimates from the combustion of tires are discussed separately. Data for total waste combusted was derived from *BioCycle* (van Haaren et al. 2010), EPA Facts and Figures Report, Energy Recovery Council (ERC), EPA's Greenhouse Gas Reporting Program (GHGRP), and the U.S. Energy Information Administration (EIA). Multiple sources were used to ensure a complete, quality dataset, as each source encompasses a different timeframe.

EPA determined the MSW tonnages based on data availability and accuracy throughout the time series.

- 1990-2006: MSW combustion tonnages are from Biocycle combustion data. Tire combustion data from the U.S. Tire Manufacturers Association (USTMA) are removed to arrive at MSW combusted without tires
- 2006-2010: MSW combustion tonnages are an average of Biocycle (with USTMA tire data tonnage removed), U.S. EPA Facts and Figures, EIA, and Energy Recovery Council data (with USTMA tire data tonnage removed).
- 2011-2021: MSW combustion tonnages are from EPA's GHGRP data.

Table 3-29 provides the estimated tons of MSW combusted including and excluding tires.

Table 3-29: Municipal Solid Waste Combusted (Short Tons)

	Waste Combusted	Waste Combusted		
Year	(excluding tires)	(including tires)		
1990	33,344,839	33,766,239		

2005	26,486,414	28,631,054
2017	28,574,258	30,310,598
2018	29,162,364	30,853,949
2019	28,174,311	29,821,141
2020	27,586,271	29,106,686
2021	27,867,446	29,261,446

Sources: BioCycle, EPA Facts and Figures, ERC, GHGRP, EIA, LISTMA

CO₂ Emissions from MSW Excluding Scrap Tires

Fossil CO_2 emission factors were calculated from EPA's GHGRP data for non-biogenic sources. Using GHGRP-reported emissions for CH_4 and N_2O and assumed emission factors, the tonnage of waste combusted, excluding tires, was derived. Methane and N_2O emissions and assumed emission factors were used to estimate the amount of MSW combusted in terms of energy content. The energy content of MSW combusted was then converted into tonnage based on assumed MSW heating value. Two estimates were generated (one for CH_4 and one for N_2O) and the two were averaged together. Dividing fossil CO_2 emissions from GHGRP FLIGHT data for MSW combustors by this estimated tonnage yielded an annual CO_2 emission factor. As this data was only available following 2011, all years prior use an average of the emission factors from 2011 through 2015. See Annex 3.7 for more detail on how MSW C factors were calculated.

Finally, CO₂ emissions were calculated by multiplying the annual tonnage estimates, excluding tires, by the calculated emissions factor. Calculated fossil CO₂ emission factors are shown in Table 3-30.

Table 3-30: Calculated Fossil CO₂ Content per Ton Waste Combusted (kg CO₂/Short Ton Combusted)

Year	1990	2005	2017	2018	2019	2020	2021
CO ₂ Emission Factors	366	366	360	361	363	377	365

CO₂ Emissions from Scrap Tires

Scrap tires contain several types of synthetic rubber, carbon black, and synthetic fibers. Each type of synthetic rubber has a discrete C content, and carbon black is 100 percent C. For synthetic rubber and carbon black in scrap tires, information was obtained biannually from U.S. Scrap Tire Management Summary for 2005 through 2021 data (USTMA 2022). Information about scrap tire composition was taken from the Rubber Manufacturers' Association internet site (USTMA 2012a). Emissions of CO₂ were calculated based on the amount of scrap tires used for fuel and the synthetic rubber and carbon black content of scrap tires. The mass of combusted material is multiplied by its C content to calculate the total amount of carbon stored. More detail on the methodology for calculating emissions from each of these waste combustion sources is provided in Annex 3.7. Table 3-31 provides CO₂ emissions from combustion of waste tires.

Table 3-31: CO₂ Emissions from Combustion of Tires (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Synthetic Rubber	0.3	1.6	1.3	1.3	1.2	1.1	1.0
C Black	0.4	2.0	1.6	1.5	1.5	1.4	1.3
Total	0.7	3.6	2.9	2.8	2.7	2.5	2.3

Non-CO₂ Emissions

Combustion of waste also results in emissions of CH_4 and N_2O . These emissions were calculated by multiplying the total estimated mass of waste combusted, including tires, by the respective emission factors. The emission factors for CH_4 and N_2O emissions per quantity of MSW combusted are default emission factors for the default continuously-fed stoker unit MSW combustion technology type and were taken from IPCC (2006).

Uncertainty

An Approach 2 Monte Carlo analysis was performed to determine the level of uncertainty surrounding the estimates of CO_2 emissions and N_2O emissions from the incineration of waste (given the very low emissions for CH_4 , no uncertainty estimate was derived). IPCC Approach 2 analysis allows the specification of probability density functions for key variables within a computational structure that mirrors the calculation of the Inventory estimate. Statistical analyses or expert judgments of uncertainty were not available directly from the information sources for most variables; thus, uncertainty estimates for these variables were determined using assumptions based on source category knowledge and the known uncertainty estimates for the waste generation variables.

The uncertainties in the waste incineration emission estimates arise from both the assumptions applied to the data and from the quality of the data. Key factors include reported CO_2 emissions; N_2O and CH_4 emissions factors, and tire synthetic rubber and black carbon contents. The highest levels of uncertainty surround the reported emissions from GHGRP; the lowest levels of uncertainty surround variables that were determined by quantitative measurements (e.g., combustion efficiency, C content of C black).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-32. Waste incineration CO_2 emissions in 2021 were estimated to be between 10.4 and 14.9 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 17 percent below to 19 percent above the 2021 emission estimate of 12.5 MMT CO_2 Eq. Also at a 95 percent confidence level, waste incineration N_2O emissions in 2021 were estimated to be between 0.2 and 0.9 MMT CO_2 Eq. This indicates a range of 54 percent below to 163 percent above the 2021 emission estimate of 0.4 MMT CO_2 Eq.

Table 3-32: Approach 2 Quantitative Uncertainty Estimates for CO₂ and N₂O from the Incineration of Waste (MMT CO₂ Eq. and Percent)

		2021 Emission Estimate	Uncertainty Range Relative to Emission Estima							
Source	Gas (MMT CO₂ Eq.)		(MMT	CO ₂ Eq.)	(%)					
			Lower	Upper	Lower	Upper				
			Bound	Bound	Bound	Bound				
Incineration of Waste	CO ₂	12.5	10.4	14.9	-17%	19%				
Incineration of Waste	N_2O	0.4	0.2	0.9	-54%	163%				

^a Range of emission estimates predicted by Monte Carlo Simulation for a 95 percent confidence interval.

QA/QC and Verification

In order to ensure the quality of the emission estimates from waste combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and specifically focused on the emission factor and activity data sources and methodology used for estimating emissions from combustion of waste. Trends across the time series were analyzed to determine whether any corrective actions were needed. Corrective actions were taken to rectify minor errors in the use of activity data.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 232 of 1050 PageID 3680

Recalculations Discussion

For the current Inventory, CO₂-equivalent emissions of CH₄ and N₂O from waste incineration have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4), used in the previous inventories (IPCC 2007). The AR5 GWPs have been applied across the entire time series for consistency. Prior inventories used GWPs of 25 and 298 for CH₄ and N₂O, respectively. These values have been updated to 28 and 265, respectively. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO₂-equivalent CH₄ emissions was a 12 percent increase and the average annual change in CO₂-equivalent N₂O emissions was an 11 percent decrease for the time series. As a result of the change in methodology, total emissions across the timeseries changed by an average annual decrease of less than 0.05 MMT CO₂ Eq. (0.3 percent) relative to emissions results calculated using the prior GWPs. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements. All other recalculations described in this section are compared using the prior GWPs.

Recalculations were performed for CO_2 estimates from 1990 through 2010. In previous Inventories, for years prior to 2011, fossil CO_2 content per ton of waste was calculated based on the average of 2011 to the current year of data. For this cycle the calculation was updated to be an average of estimates from 2011 – 2015. Earlier data is assumed to more closely approximate the MSW composition for historic years. As a result of the change in methodology, CO_2 emissions in 1990 decreased by less than 0.05 MMT CO_2 Eq. relative to the previous Inventory and there was an average annual decrease by less than 0.05 MMT CO_2 Eq. from 1990 through 2010.

Recalculations were performed on the estimate of combusted scrap tires in 2020. 2020 estimates for the scrap tire market were previously proxied from the 2019 U.S. Scrap Tire Management Summary (USTMA 2020). The 2021 U.S. Scrap Tire Management Summary was released in October 2022, allowing 2020 estimates to now be calculated by linear interpolation between 2019 and 2021 data. As a result of the change in methodology, CO_2 emissions in 2020 decreased by 0.2 MT CO_2 Eq. relative to the previous Inventory.

Planned Improvements

No planned improvements for waste combustion were identified.

3.4 Coal Mining (CRF Source Category 1B1a)

Three types of coal mining-related activities release CH_4 and CO_2 to the atmosphere: underground mining, surface mining, and post-mining (i.e., coal-handling) activities. While surface coal mines account for the majority of U.S. coal production, underground coal mines contribute the largest share of fugitive CH_4 emissions (see Table 3-34 and Table 3-35) due to the higher CH_4 content of coal in the deeper underground coal seams. In 2021, 174 underground coal mines and 332 surface mines were operating in the United States (EIA 2022). In recent years, the total number of active coal mines in the United States has declined. In 2021, the United States was the fourth largest coal producer in the world (539 MMT), after China (3,685 MMT), India (771 MMT), and Indonesia (545 MMT) (IEA 2022).

Table 3-33: Coal Production (kt)

Year	Undergro	und	Surface	9	Total	
	Number of Mines	Production	Number of Mines	Production	Number of Mines	Production
1990	1,683	384,244	1,656	546,808	3,339	931,052

2005	586	334,399	789	691,447	1,398	1,025,846
2017	237	247,778	434	454,301	671	702,080
2018	236	249,804	430	435,521	666	685,325
2019	226	242,557	432	397,750	658	640,307
2020	196	177,380	350	307,944	546	485,324
2021	174	200,122	332	323,142	506	523,264

Fugitive CH₄ Emissions

Underground coal mines liberate CH₄ from ventilation systems and from degasification systems. Ventilation systems pump air through the mine workings to dilute noxious gases and ensure worker safety; these systems can exhaust significant amounts of CH₄ to the atmosphere in low concentrations. Degasification systems are wells drilled from the surface or boreholes drilled inside the mine that remove large, often highly concentrated volumes of CH₄ before, during, or after mining. Some mines recover and use CH₄ generated from ventilation and degasification systems, thereby reducing emissions to the atmosphere.

Surface coal mines liberate CH₄ as the overburden is removed and the coal is exposed to the atmosphere. Methane emissions are normally a function of coal rank (a classification related to the percentage of carbon in the coal) and depth. Surface coal mines typically produce lower-rank coals and remove less than 250 feet of overburden, so their level of emissions is much lower than from underground mines.

In addition, CH₄ is released during post-mining activities, as the coal is processed, transported, and stored for use.

Total CH₄ emissions in 2021 were estimated to be 1,595 kt (44.7 MMT CO₂ Eq.), a decline of approximately 59 percent since 1990 (see Table 3-34 and Table 3-35). In 2021, underground mines accounted for approximately 74 percent of total emissions, surface mines accounted for 13 percent, and post-mining activities accounted for 13 percent. In 2021, total CH₄ emissions from coal mining decreased by approximately 3 percent relative to the previous year. Total coal production in 2021 increased by 8 percent compared to 2020. This resulted in an increase of 7 percent in CH₄ emissions from surface mining and post-mining activities in 2021. However, surface mining and post-mining activities have a lower impact on total CH₄ compared to underground mining (74 percent of total emissions in 2021). The number of operating underground mines decreased in 2021 resulting in a slight decrease in overall CH₄ emissions (3 percent), compared to 2020. Additionally, the amount of CH₄ recovered and used in 2021 decreased by less than 0.5 percent compared to 2020 levels.

Table 3-34: CH₄ Emissions from Coal Mining (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	83.1	47.1	45.6	43.6	38.5	35.2	32.9
Liberated	90.5	66.9	65.1	64.6	56.3	53.5	51.2
Recovered & Used	(7.4)	(19.8)	(19.5)	(21.0)	(17.8)	(18.3)	(18.3)
Surface Mining	12.0	13.3	8.1	7.8	7.2	5.4	5.7
Post-Mining (UG)	10.3	8.6	6.0	5.9	5.8	4.3	4.8
Post-Mining (Surface)	2.6	2.9	1.8	1.7	1.5	1.2	1.2
Total	108.1	71.8	61.4	59.1	53.0	46.2	44.7

Note: Parentheses indicate negative values.

Table 3-35: CH₄ Emissions from Coal Mining (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	2,968	1,682	1,627	1,557	1,376	1,257	1,176
Liberated	3,231	2,388	2,324	2,308	2,012	1,912	1,828
Recovered & Used	(263)	(706)	(697)	(751)	(636)	(654)	(652)
Surface Mining	430	475	290	280	255	194	205

Post-Mining (UG)	368	306	213	212	206	155	170
Post-Mining (Surface)	93	103	63	61	55	42	44
Total	3,860	2,566	2,192	2,110	1,893	1,648	1,595

Note: Parentheses indicate negative values.

Methodology and Time-Series Consistency

EPA uses an IPCC Tier 3 method for estimating CH_4 emissions from underground coal mining and an IPCC Tier 2 method for estimating CH_4 emissions from surface mining and post-mining activities (for coal production from both underground mines and surface mines). The methodology for estimating CH_4 emissions from coal mining consists of two steps:

- Estimate CH₄ emissions from underground mines. These emissions have two sources: ventilation systems and degasification systems. They are estimated using mine-specific data, then summed to determine total CH₄ liberated. The CH₄ recovered and used is then subtracted from this total, resulting in an estimate of net emissions to the atmosphere.
- Estimate CH₄ emissions from surface mines and post-mining activities. Unlike the methodology for underground mines, which uses mine-specific data, the methodology for estimating emissions from surface mines and post-mining activities consists of multiplying basin-specific coal production by basin-specific gas content and an emission factor.

Step 1: Estimate CH₄ Liberated and CH₄ Emitted from Underground Mines

Underground mines generate CH₄ from ventilation systems and degasification systems. Some mines recover and use the liberated CH₄, thereby reducing emissions to the atmosphere. Total CH₄ emitted from underground mines equals the CH₄ liberated from ventilation systems, plus the CH₄ liberated from degasification systems, minus the CH₄ recovered and used.

Step 1.1: Estimate CH₄ Liberated from Ventilation Systems

To estimate CH₄ liberated from ventilation systems, EPA uses data collected through its Greenhouse Gas Reporting Program (GHGRP)⁶² (Subpart FF, "Underground Coal Mines"), data provided by the U.S. Mine Safety and Health Administration (MSHA) (MSHA 2022), and occasionally data collected from other sources on a site-specific level (e.g., state gas production databases). Since 2011, the nation's "gassiest" underground coal mines—those that liberate more than 36,500,000 actual cubic feet of CH₄ per year (about 17,525 MT CO₂ Eq.)—have been required to report to EPA's GHGRP (EPA 2022). ⁶³ Mines that report to EPA's GHGRP must report quarterly measurements of CH₄ emissions from ventilation systems; they have the option of recording and reporting their own measurements, or using the measurements taken by MSHA as part of that agency's quarterly safety inspections of all mines in the United States with detectable CH₄ concentrations. ⁶⁴

Since 2013, ventilation CH₄ emission estimates have been calculated based on both quarterly GHGRP data submitted by underground mines and on quarterly measurement data obtained directly from MSHA. Because not all mines report under EPA's GHGRP, the emissions of the mines that do not report must be calculated using MSHA

⁶² In implementing improvements and integrating data from EPA's GHGRP, EPA followed the latest guidance from the IPCC on the use of facility-level data in national inventories (IPCC 2011).

⁶³ Underground coal mines report to EPA under Subpart FF of the GHGRP (40 CFR Part 98). In 2021, 60 underground coal mines reported to the program.

⁶⁴ MSHA records coal mine CH₄ readings with concentrations of greater than 50 ppm (parts per million) CH₄. Readings below this threshold are considered non-detectable.

data. The MSHA data also serves as a quality assurance tool for validating GHGRP data. For GHGRP data, reported quarterly ventilation methane emissions (metric tons) are summed for each mine to develop mine-specific annual ventilation emissions. For MSHA data, the average daily CH₄ emission rate for each mine is determined using the CH₄ total for all data measurement events conducted during the calendar year and total duration of all data measurement events (in days). The calculated average daily CH₄ emission rate is then multiplied by 365 days to estimate annual ventilation CH₄ emissions for the MSHA dataset.

Step 1.2: Estimate CH₄ Liberated from Degasification Systems

Particularly gassy underground mines also use degasification systems (e.g., wells or boreholes) to remove CH₄ before, during, or after mining. This CH₄ can then be collected for use or vented to the atmosphere. Twenty mines used degasification systems in 2021 and all of these mines reported the CH₄ removed through these systems to EPA's GHGRP under Subpart FF (EPA 2022). Based on the weekly measurements reported to EPA's GHGRP, degasification data summaries for each mine are added to estimate the CH₄ liberated from degasification systems. Twelve of the 20 mines with degasification systems had operational CH₄ recovery and use projects, including two mines with two recovery and use projects each (see step 1.3 below). 65

Degasification data reported to EPA's GHGRP by underground coal mines is the primary source of data used to develop estimates of CH₄ liberated from degasification systems. Data reported to EPA's GHGRP were used exclusively to estimate CH₄ liberated from degasification systems at 15 of the 20 mines that used degasification systems in 2021. Data from state gas well production databases were used to supplement GHGRP degasification data for the remaining five mines (DMME 2022; GSA 2022; WVGES 2022).

For pre-mining wells, cumulative degasification volumes that occur prior to the well being mined through are attributed to the mine in the inventory year in which the well is mined through. ⁶⁶ EPA's GHGRP does not require gas production from virgin coal seams (coalbed methane) to be reported by coal mines under Subpart FF. ⁶⁷ Most pre-mining wells drilled from the surface are considered coalbed methane wells prior to mine-through and associated CH₄ emissions are reported under another subpart of the GHGRP (Subpart W, "Petroleum and Natural Gas Systems"). As a result, GHGRP data must be supplemented to estimate cumulative degasification volumes that occurred prior to well mine-through. There were four mines with degasification systems that include pre-mining wells that were mined through in 2021. For all of these mines, GHGRP data were supplemented with historical data from state gas well production databases (DMME 2022; ERG 2022; GSA 2022; WVGES 2022), as well as with mine-specific information regarding the locations and dates on which the pre-mining wells were mined through (JWR 2010; El Paso 2009; ERG 2022).

Step 1.3: Estimate CH₄ Recovered from Ventilation and Degasification Systems, and Utilized or Destroyed (Emissions Avoided)

Twelve mines had a total of fourteen CH_4 recovery and use projects in place in 2021, including two mines that each have two recovery and use projects. Thirteen of these projects involved degasification systems with one mine having a ventilation air methane abatement project (VAM). Ten of these mines sold the recovered CH_4 to a pipeline, including one that also used CH_4 to fuel a thermal coal dryer. One mine destroyed recovered CH_4 using flares. One mine destroyed the recovered CH_4 (VAM) using regenerative thermal oxidation (RTO) without energy recovery and using enclosed flares.

Energy 3-65

 $^{^{65}}$ Several of the mines venting CH₄ from degasification systems use a small portion of the gas to fuel gob well blowers in remote locations where electricity is not available. However, this CH₄ use is not considered to be a formal recovery and use project.

⁶⁶ A well is "mined through" when coal mining development or the working face intersects the borehole or well.

⁶⁷ This applies for pre-drainage in years prior to the well being mined through. Beginning with the year the well is mined through, the annual volume of CH₄ liberated from a pre-drainage well is reported under Subpart FF of EPA's GHGRP.

The CH₄ recovered and used (or destroyed) at the twelve mines described above are estimated using the following methods:

- EPA's GHGRP data was exclusively used to estimate the CH₄ recovered and used from six of the 12 mines that deployed degasification systems in 2021. Based on weekly measurements, the GHGRP degasification destruction data summaries for each mine are added together to estimate the CH₄ recovered and used from degasification systems.
- State sales data were used to supplement GHGRP data to estimate CH₄ recovered and used from five mines that deployed degasification systems in 2021 (DMME 2022, ERG 2022, GSA 2022, and WVGES 2022). Four of these mines intersected pre-mining wells in 2021. Supplemental information is used for these mines because estimating CH₄ recovery and use from pre-mining wells requires additional data not reported under Subpart FF of EPA's GHGRP (see discussion in step 1.2 above) to account for the emissions avoided prior to the well being mined through. The supplemental data is obtained from state gas production databases as well as mine-specific information on the location and timing of mined-through pre-mining wells.
- For the single mine that employed VAM for CH₄ recovery and use, the estimates of CH₄ recovered and used were obtained from the mine's offset verification statement (OVS) submitted to the California Air Resources Board (CARB) (McElroy OVS 2022). This mine also reported CH₄ reductions from flaring. GHGRP data were used to estimate CH₄ recovered and flared in 2021.

Step 2: Estimate CH₄ Emitted from Surface Mines and Post-Mining Activities

Mine-specific data are not available for estimating CH₄ emissions from surface coal mines or for post-mining activities. For surface mines, basin-specific coal production obtained from the Energy Information Administration's *Annual Coal Report* (EIA 2022) is multiplied by basin-specific CH₄ contents (EPA 1996, 2005) and a 150 percent emission factor (to account for CH₄ from over- and under-burden) to estimate CH₄ emissions (King 1994; Saghafi 2013). For post-mining activities, basin-specific coal production is multiplied by basin-specific CH₄ contents and a mid-range 32.5 percent emission factor for CH₄ desorption during coal transportation and storage (Creedy 1993). Basin-specific in situ gas content data were compiled from AAPG (1984) and USBM (1986).

Fugitive CO₂ Emissions

Methane and CO_2 are naturally occurring in coal seams and are collectively referred to as coal seam gas. These gases remain trapped in the coal seam until coal is mined (i.e., coal seam is exposed and fractured during mining operations). Fugitive CO_2 emissions occur during underground coal mining, surface coal mining, and post-mining activities. Methods and data to estimate fugitive CO_2 emissions from underground and surface coal mining are presented in the sections below. Fugitive CO_2 emissions from post-mining activities were not estimated due to the lack of an IPCC method and unavailability of data.

Total fugitive CO_2 emissions in 2021 were estimated to be 2,456 kt (2.5 MMT CO_2 Eq.), a decline of approximately 47 percent since 1990. In 2021, underground mines accounted for approximately 89 percent of total fugitive CO_2 emissions. In 2021, total fugitive CO_2 emissions from coal mining increased by approximately 12 percent relative to the previous year. This increase was due to an increase in annual coal production.

Table 3-36: CO₂ Emissions from Coal Mining (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	4.2	3.6	2.8	2.8	2.7	1.9	2.2
Liberated	4.2	3.6	2.7	2.7	2.6	1.9	2.2
Recovered & Used	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Flaring	NO	NO	0.1	0.1	0.1	+	+
Surface Mining	0.4	0.6	0.4	0.4	0.3	0.2	0.3

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 237 of 1050 PageID 3685

Total	4.6	4.2	3.2	3.1	3.0	2.2	2.5

+ Does not exceed 0.05 MMT CO₂ Eq.

NO (Not Occurring)

Note: Parentheses indicate negative values.

Table 3-37: CO₂ Emissions from Coal Mining (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	4,164	3,610	2,785	2,789	2,670	1,948	2,194
Liberated	4,171	3,630	2,690	2,712	2,633	1,926	2,173
Recovered & Used	(8)	(20)	(19)	(21)	(18)	(18)	(18)
Flaring	NO	NO	114	97	55	41	40
Surface Mining	443	560	368	353	322	249	262
Total	4,606	4,170	3,153	3,141	2,992	2,198	2,456

NO (Not Occurring)

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

EPA uses an IPCC Tier 1 method for estimating fugitive CO_2 emissions from underground coal mining and surface mining (IPCC 2019). IPCC methods and data to estimate fugitive CO_2 emissions from post-mining activities (for both underground and surface coal mining) are currently not available.

Step 1: Underground Mining

EPA used the following overarching IPCC equation to estimate fugitive CO₂ emissions from underground coal mines (IPCC 2019):

Equation 3-1: Estimating Fugitive CO₂ Emissions from Underground Mines

Total CO_2 from Underground Mines = CO_2 from underground mining – Amount of CO_2 in gas recovered + CO_2 from methane flaring

Step 1.1: Estimate Fugitive CO₂ Emissions from Underground Mining

EPA estimated fugitive CO₂ emissions from underground mining using the IPCC Tier 1 emission factor (5.9 m³/metric ton) and annual coal production from underground mines (EIA 2022). The underground mining default emission factor accounts for all the fugitive CO₂ likely to be emitted from underground coal mining. Therefore, the amount of CO₂ from coal seam gas recovered and utilized for energy is subtracted from underground mining estimates in Step 2, below. Under IPCC methods, the CO₂ emissions from gas recovered and utilized for energy use (e.g., injected into a natural gas pipeline) are reported under other sectors of the Inventory (e.g., stationary combustion of fossil fuel or oil and natural gas systems) and not under the coal mining sector.

Step 1.2: Estimate Amount of CO_2 In Coal Seam Gas Recovered for Energy Purposes

EPA estimated fugitive CO₂ emissions from coal seam gas recovered and utilized for energy purposes by using the IPCC Tier 1 default emission factor (19.57 metric tons CO₂/million cubic meters of coal bed methane (CBM) produced) and quantity of coal seam gas recovered and utilized. Data on annual quantity of coal seam gas recovered and utilized are available from GHGRP and state sales data (GHGRP 2022; DMME 2022; ERG 2022; GSA 2022; WVGES 2022). The quantity of coal seam gas recovered and destroyed without energy recovery (e.g., VAM projects) is deducted from the total coal seam gas recovered quantity (McElroy OVS 2022).

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 238 of 1050 PageID 3686

Step 1.3: Estimate Fugitive CO₂ Emissions from Flaring

The IPCC method includes combustion CO_2 emissions from gas recovered for non-energy uses (i.e., flaring, or catalytic oxidation) under fugitive CO_2 emission estimates for underground coal mining. In effect, these emissions, though occurring through stationary combustion, are categorized as fugitive emissions in the Inventory. EPA estimated CO_2 emissions from methane flaring using the following equation:

Equation 3-2: Estimating CO₂ Emissions from Drained Methane Flared or Catalytically Oxidized

 CO_2 from flaring = 0.98 × Volume of methane flared × Conversion Factor × Stoichiometric Mass Factor

Currently there are three mines that report catalytic oxidation of recovered methane through flaring without energy use. Annual data for 2021 were obtained from one mine's offset verification statement (OVS) submitted to the California Air Resources Board (CARB) and the GHGRP for the remaining two mines (McElroy OVS 2022; GHGRP 2022).

Step 2: Surface Mining

EPA estimated fugitive CO₂ emissions from surface mining using the IPCC Tier 1 emission factor (0.44 m³/metric ton) and annual coal production from surface mines (EIA 2022).

Uncertainty

A quantitative uncertainty analysis was conducted for the coal mining source category using the IPCC-recommended Approach 2 uncertainty estimation methodology. Because emission estimates of CH₄ from underground ventilation systems were based on actual measurement data from EPA's GHGRP or from MSHA, uncertainty is relatively low. A degree of imprecision was introduced because the ventilation air measurements used were not continuous but rather quarterly instantaneous readings that were used to determine the average annual emission rates. Additionally, the measurement equipment used can be expected to have resulted in an average of 10 percent overestimation of annual CH₄ emissions (Mutmansky & Wang 2000). Equipment measurement uncertainty is applied to GHGRP data.

Estimates of CH₄ liberated and recovered by degasification systems are relatively certain for utilized CH₄ because of the availability of EPA's GHGRP data and state gas sales information. Many of the liberation and recovery estimates use data on wells within 100 feet of a mined area. However, uncertainty exists concerning the radius of influence of each well. The number of wells counted, and thus the liberated CH₄ and avoided emissions, may vary if the drainage area is found to be larger or smaller than estimated.

EPA's GHGRP requires weekly CH_4 monitoring of mines that report degasification systems, and continuous CH_4 monitoring is required for CH_4 utilized on- or off-site. Since 2012, GHGRP data have been used to estimate CH_4 emissions from vented degasification wells, reducing the uncertainty associated with prior MSHA estimates used for this sub-source. Beginning in 2013, GHGRP data were also used for determining CH_4 recovery and use at mines without publicly available gas usage or sales records, which has reduced the uncertainty from previous estimation methods that were based on information from coal industry contacts.

Surface mining and post-mining emissions are associated with considerably more uncertainty than underground mines, because of the difficulty in developing accurate emission factors from field measurements. However, since underground coal mining, as a general matter, results in significantly larger CH₄ emissions due to production of higher-rank coal and greater depth, and estimated emissions from underground mining constitute the majority of estimated total coal mining CH₄ emissions, the uncertainty associated with underground emissions is the primary factor that determines overall uncertainty.

The major sources of uncertainty for estimates of fugitive CO₂ emissions are the Tier 1 IPCC default emission factors used for underground mining (-50 percent to +100 percent) and surface mining (-67 percent to +200 percent) (IPCC 2019). Additional sources of uncertainty for fugitive CO₂ emission estimates include EIA's annual coal production data and data used for gas recovery projects, such as GHGRP data, state gas sales data, and VAM estimates for the single mine that operates an active VAM project. Uncertainty ranges for these additional data sources are already available, as these are the same data sources used for CH₄ emission estimates.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-38. Coal mining CH_4 emissions in 2021 were estimated to be between 40.1 and 54.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 10.2 percent below to 21.5 percent above the 2021 emission estimate of 44.7 MMT CO_2 Eq. Coal mining fugitive CO_2 emissions in 2021 were estimated to be between 0.8 and 4.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 67.6 percent below to 75.8 percent above the 2021 emission estimate of 2.5 MMT CO_2 Eq.

Table 3-38: Approach 2 Quantitative Uncertainty Estimates for CH₄ and CO₂ Emissions from Coal Mining (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	2021 Emission Estimate Uncertainty Range Relative						
Jource	Gus	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Coal Mining	CH ₄	44.7	40.1	54.3	-10%	+22%			
Coal Mining	CO_2	2.5	0.8	4.3	-68%	+76%			

^a Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

QA/QC and Verification

In order to ensure the quality of the emission estimates for coal mining, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and reported emissions data used for estimating fugitive emissions from coal mining. Trends across the time series were analyzed to determine whether any corrective actions were needed.

Emission estimates for coal mining rely in large part on data reported by coal mines to EPA's GHGRP. EPA verifies annual facility-level reports through a multi-step process to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. All reports submitted to EPA are evaluated by electronic validation and verification checks. If potential errors are identified, EPA will notify the reporter, who can resolve the issue either by providing an acceptable response describing why the flagged issue is not an error or by correcting the flagged issue and resubmitting their annual report. Additional QA/QC and verification procedures occur for each GHGRP subpart. No QA/QC issues or errors were identified in the 2021 Subpart FF data.

Recalculations Discussion

State gas sales production values were updated for five mines, as part of normal updates. This update impacted CH₄ emissions for 1998 to 2020. As a result of this update, CH₄ emissions from degasification systems and CH₄ emissions avoided increased across the time-series. Degasification CH₄ emissions increased slightly by an average of 0.4 percent and CH₄ emissions avoided increased by an average of 1.6 percent over the 1998 to 2020 time series, compared to the previous Inventory.

Fugitive CO₂ emissions from flaring were recalculated for 2014 through 2020 as a result of adding two flaring projects to the Inventory, as part of normal updates. One of the flaring projects was operational from 2014 onwards and the other one started in 2020. As a result of this update, flaring CO₂ emissions for 2014 to 2020 increased by an average of 230 percent, compared to the previous Inventory, with 2020 emissions increasing by

277 percent. However, as flaring CO_2 emissions only contribute 2 percent of total fugitive CO_2 emissions, this update resulted in a slight increase of overall fugitive CO_2 emissions for 2014 to 2020 by an average of 2 percent, compared to the previous Inventory.

In addition to the above-mentioned updates, for the current Inventory, estimates of CO₂-equivalent CH₄ emissions from coal mining have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ increased from 25 to 28, leading to an overall increase in CO₂-equivalent CH₄ emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO₂-equivalent CH₄ emissions was a 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

The net impact from the updates listed above was an average annual 12 percent increase in CH₄ emissions and an average annual 0.4 percent increase in CO₂ emissions for the time series.

Planned Improvements

EPA is assessing planned improvements for future reports, but at this time has no specific planned improvements for estimating CH₄ and CO₂ emissions from underground and surface mining and CH₄ emissions from post-mining.

3.5 Abandoned Underground Coal Mines (CRF Source Category 1B1a)

Underground coal mines contribute the largest share of coal mine methane (CMM) emissions, with active underground mines the leading source of underground emissions. However, mines also continue to release CH₄ after closure. As mines mature and coal seams are mined through, mines are closed and abandoned. Many are sealed and some flood through intrusion of groundwater or surface water into the void. Shafts or portals are generally filled with gravel and capped with a concrete seal, while vent pipes and boreholes are plugged in a manner similar to oil and gas wells. Some abandoned mines are vented to the atmosphere to prevent the buildup of CH₄ that may find its way to surface structures through overburden fractures. As work stops within the mines, CH₄ liberation decreases but it does not stop completely. Following an initial decline, abandoned mines can liberate CH₄ at a near-steady rate over an extended period of time, or if flooded, produce gas for only a few years. The gas can migrate to the surface through the conduits described above, particularly if they have not been sealed adequately. In addition, diffuse emissions can occur when CH₄ migrates to the surface through cracks and fissures in the strata overlying the coal mine. The following factors influence abandoned mine emissions:

- Time since abandonment;
- Gas content and adsorption characteristics of coal;
- CH₄ flow capacity of the mine;
- Mine flooding;
- Presence of vent holes; and
- Mine seals.

Annual gross abandoned mine CH_4 emissions ranged from 8.1 to 12.1 MMT CO_2 Eq. from 1990 to 2021, varying, in general, by less than 1 percent to approximately 19 percent from year to year. Fluctuations were due mainly to the number of mines closed during a given year as well as the magnitude of the emissions from those mines when active. Gross abandoned mine emissions peaked in 1996 (12.1 MMT CO_2 Eq.) due to the large number of gassy

mine 68 closures from 1994 to 1996 (72 gassy mines closed during the three-year period). In spite of this rapid rise, abandoned mine emissions have been generally on the decline since 1996. Since 2002, there have been fewer than twelve gassy mine closures each year. In 2021 there were two gassy mine closures. Gross abandoned mine emissions decreased slightly from 9.4 MMT CO_2 Eq. (335 kt CH_4) in 2020 to 9.2 (330 kt CH_4) MMT CO_2 Eq. in 2021 (see Table 3-39 and Table 3-40). Gross emissions are reduced by CH_4 recovered and used at 47 mines, resulting in net emissions in 2021 of 6.4 MMT CO_2 Eq. (228 kt CH_4).

Table 3-39: CH₄ Emissions from Abandoned Coal Mines (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Underground Mines	8.1	9.3	10.3	9.9	9.6	9.4	9.2
Recovered & Used	NO	(2.0)	(3.1)	(3.0)	(2.9)	(2.9)	(2.9)
Total	8.1	7.4	7.2	6.9	6.6	6.5	6.4

NO (Not Occurring)

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Table 3-40: CH₄ Emissions from Abandoned Coal Mines (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Underground Mines	288	334	367	355	341	335	330
Recovered & Used	NO	(70)	(109)	(107)	(104)	(103)	(103)
Total	288	264	257	247	237	232	228

NO (Not Occurring)

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

Estimating CH₄ emissions from an abandoned coal mine requires predicting the emissions of a mine from the time of abandonment through the inventory year of interest. The flow of CH₄ from the coal to the mine void is primarily dependent on the mine's emissions when active and the extent to which the mine is flooded or sealed. The CH₄ emission rate before abandonment reflects the gas content of the coal, the rate of coal mining, and the flow capacity of the mine in much the same way as the initial rate of a water-free conventional gas well reflects the gas content of the producing formation and the flow capacity of the well. A well or a mine that produces gas from a coal seam and the surrounding strata will produce less gas through time as the reservoir of gas is depleted. Depletion of a reservoir will follow a predictable pattern depending on the interplay of a variety of natural physical conditions imposed on the reservoir. The depletion of a reservoir is commonly modeled by mathematical equations and mapped as a type curve. Type curves, which are referred to as decline curves, have been developed for abandoned coal mines. Existing data on abandoned mine emissions through time, although sparse, appear to fit the hyperbolic type of decline curve used in forecasting production from natural gas wells.

To estimate CH₄ emissions over time for a given abandoned mine, it is necessary to apply a decline function, initiated upon abandonment, to that mine. In the analysis, mines were grouped by coal basin with the assumption that they will generally have the same initial pressures, permeability, and isotherm. As CH₄ leaves the system, the reservoir pressure (Pr) declines as described by the isotherm's characteristics. The emission rate declines because the mine pressure (Pw) is essentially constant at atmospheric pressure for a vented mine, and the productivity index (Pl), which is expressed as the flow rate per unit of pressure change, is essentially constant at the pressures of interest (atmospheric to 30 psia). The CH₄ flow rate is determined by the laws of gas flow through porous media, such as Darcy's Law. A rate-time equation can be generated that can be used to predict future emissions. This decline through time is hyperbolic in nature and can be empirically expressed as:

⁶⁸ A mine is considered a "gassy" mine if it emits more than 100 thousand cubic feet of CH₄ per day (100 Mcfd).

Equation 3-3: Decline Function to Estimate Venting Abandoned Mine Methane Emissions

$$q = q_i \left(1 + bD_i t\right)^{\left(-\frac{1}{b}\right)}$$

where,

q = Gas flow rate at time t in million cubic feet per day (mmcfd)

q_i = Initial gas flow rate at time zero (t_o), mmcfd b = The hyperbolic exponent, dimensionless

D_i = Initial decline rate, 1/year t = Elapsed time from t_o (years)

This equation is applied to mines of various initial emission rates that have similar initial pressures, permeability, and adsorption isotherms (EPA 2004).

The decline curves created to model the gas emission rate of coal mines must account for factors that decrease the rate of emissions after mining activities cease, such as sealing and flooding. Based on field measurement data, it was assumed that most U.S. mines prone to flooding will become completely flooded within eight years and therefore will no longer have any measurable CH₄ emissions. Based on this assumption, an average decline rate for flooded mines was established by fitting a decline curve to emissions from field measurements. An exponential equation was developed from emissions data measured at eight abandoned mines known to be filling with water located in two of the five basins. Using a least squares, curve-fitting algorithm, emissions data were matched to the exponential equation shown below. For this analysis of flooded abandoned mines, there was not enough data to establish basin-specific equations, as was done with the vented, non-flooding mines (EPA 2004). This decline through time can be empirically expressed as:

Equation 3-4: Decline Function to Estimate Flooded Abandoned Mine Methane Emissions

$$q = q_i e^{(-Dt)}$$

where,

q = Gas flow rate at time t in mmcfd

q_i = Initial gas flow rate at time zero (t_o), mmcfd

D = Decline rate, 1/year

t = Elapsed time from t₀ (years)

Seals have an inhibiting effect on the rate of flow of CH_4 into the atmosphere compared to the flow rate that would exist if the mine had an open vent. The total volume emitted will be the same, but emissions will occur over a longer period of time. The methodology, therefore, treats the emissions prediction from a sealed mine similarly to the emissions prediction from a vented mine, but uses a lower initial rate depending on the degree of sealing. A computational fluid dynamics simulator was used with the conceptual abandoned mine model to predict the decline curve for inhibited flow. The percent sealed is defined as $100 \times (1 - [initial emissions from sealed mine / emission rate at abandonment prior to sealing]). Significant differences are seen between 50 percent, 80 percent, and 95 percent closure. These decline curves were therefore used as the high, middle, and low values for emissions from sealed mines (EPA 2004).$

For active coal mines, those mines producing over 100 thousand cubic feet per day (Mcfd) of CH₄ account for about 98 percent of all CH₄ emissions. This same relationship is assumed for abandoned mines. It was determined that the 530 abandoned mines closed since 1972 produced CH₄ emissions greater than 100 Mcfd when active. Further, the status of 306 of the 530 mines (or 58 percent) is known to be either: 1) vented to the atmosphere; 2) sealed to some degree (either earthen or concrete seals); or 3) flooded (enough to inhibit CH₄ flow to the atmosphere). The remaining 42 percent of the mines whose status is unknown were placed in one of these three categories by applying a probability distribution analysis based on the known status of other mines located in the same coal basin (EPA 2004). Table 3-41 presents the count of mines by post-abandonment state, based on EPA's probability distribution analysis.

Table 3-41: Number of Gassy Abandoned Mines Present in U.S. Basins in 2021, Grouped by Class According to Post-Abandonment State

				Total		
Basin	Sealed	Vented	Flooded	Known	Unknown	Total Mines
Central Appl.	43	25	50	118	144	262
Illinois	35	3	14	52	31	83
Northern Appl.	48	23	15	86	39	125
Warrior Basin	0	0	16	16	0	16
Western Basins	28	4	2	34	10	44
Total	154	55	97	306	224	530

Inputs to the decline equation require the average CH₄ emission rate prior to abandonment and the date of abandonment. Generally, these data are available for mines abandoned after 1971; however, such data are largely unknown for mines closed before 1972. Information that is readily available, such as coal production by state and county, is helpful but does not provide enough data to directly employ the methodology used to calculate emissions from mines abandoned before 1972. It is assumed that pre-1972 mines are governed by the same physical, geologic, and hydrologic constraints that apply to post-1971 mines; thus, their emissions may be characterized by the same decline curves.

During the 1970s, 78 percent of CH₄ emissions from coal mining came from seventeen counties in seven states. Mine closure dates were obtained for two states, Colorado and Illinois, for the hundred-year period extending from 1900 through 1999. The data were used to establish a frequency of mine closure histogram (by decade) and applied to the other five states with gassy mine closures. As a result, basin-specific decline curve equations were applied to the 145 gassy coal mines estimated to have closed between 1920 and 1971 in the United States, representing 78 percent of the emissions. State-specific, initial emission rates were used based on average coal mine CH₄ emission rates during the 1970s (EPA 2004).

Abandoned mine emission estimates are based on all closed mines known to have active mine CH₄ ventilation emission rates greater than 100 Mcfd at the time of abandonment. For example, for 1990 the analysis included 145 mines closed before 1972 and 258 mines closed between 1972 and 1990. Initial emission rates based on MSHA reports, time of abandonment, and basin-specific decline curves influenced by a number of factors were used to calculate annual emissions for each mine in the database (MSHA 2022). Coal mine degasification data are not available for years prior to 1990, thus the initial emission rates used reflect only ventilation emissions for pre-1990 closures. Methane degasification amounts were added to the quantity of CH₄ vented to determine the total CH₄ liberation rate for all mines that closed between 1992 and 2021. Since the sample of gassy mines described above is assumed to account for 78 percent of the pre-1972 and 98 percent of the post-1971 abandoned mine emissions, the modeled results were multiplied by 1.22 and 1.02, respectively, to account for all U.S. abandoned mine emissions.

From 1993 through 2021, emission totals were downwardly adjusted to reflect CH₄ emissions avoided from abandoned mines with CH₄ recovery and use or destruction systems. Currently, there are 48 abandoned mines with recovery projects, including 11 projects at mines abandoned before 1972 (pre-1972 mines) (EPA 2004, CMOP 2022). Because CH₄ recovered by these projects is expected to decline with the age of the mine, CH₄ recovery is assumed to be the total estimated CH₄ liberated based on the mine's decline function except for three recovery projects where additional data are available (COGIS 2018, MSHA 2022).⁶⁹

The Inventory totals were not adjusted for abandoned mine CH_4 emissions avoided from 1990 through 1992 due to unavailability of data. Avoided CH_4 emissions from pre-1972 abandoned mines are estimated by multiplying the total estimated emissions from these mines in each decade by the fraction of mines with recovery projects in that

⁶⁹ Data from a state oil and gas database (COGIS) is used for one project and the mine status information from MSHA for two mines (sealed and flooded) indicate zero recovery emissions for these projects.

decade. For recovery projects at pre-1972 abandoned mines, four projects are at mines abandoned in the 1920s, three in the 1930s, two in the 1950s, and two in the 1960s (EPA 2004).

Starting with the current (i.e., 1990 through 2021) Inventory, in addition to reviewing Coalbed Methane Outreach Program data (CMOP 2022), the recovery project list was checked against the International Coal Mine Methane Database (GMI 2016). Of the 24 operational recovery projects for U.S. abandoned coal mines currently available in the GMI dataset, 18 are already included in the AMM model. The remaining six projects in the GMI dataset are for mines that are not yet abandoned according to MSHA records (MSHA 2022). Therefore, no new recovery projects were added from this database for the 1990 through 2021 Inventory.

Uncertainty

A quantitative uncertainty analysis was conducted for the abandoned coal mine source category using the IPCC-recommended Approach 2 uncertainty estimation methodology. The uncertainty analysis provides for the specification of probability density functions for key variables within a computational structure that mirrors the calculation of the Inventory estimate. The results provide the range within which, with 95 percent certainty, emissions from this source category are likely to fall.

As discussed above, the parameters for which values must be estimated for each mine to predict its decline curve are: 1) the coal's adsorption isotherm; 2) CH₄ flow capacity as expressed by permeability; and 3) pressure at abandonment. Because these parameters are not available for each mine, a methodological approach to estimating emissions was used that generates a probability distribution of potential outcomes based on the most likely value and the probable range of values for each parameter. The range of values is not meant to capture the extreme values, but rather values that represent the highest and lowest quartile of the cumulative probability density function of each parameter. Once the low, mid, and high values are selected, they are applied to a probability density function.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-42. Annual abandoned coal mine CH_4 emissions in 2021 were estimated to be between 5.0 and 7.7 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 22 percent below to 21 percent above the 2021 emission estimate of 6.4 MMT CO_2 Eq. One of the reasons for the relatively narrow range is that mine-specific data is available for use in the methodology for mines closed in 1972 and later years. Emissions from mines closed prior to 1972 have the largest degree of uncertainty because no mine-specific CH_4 liberation rates at the time of abandonment exist.

Table 3-42: Approach 2 Quantitative Uncertainty Estimates for CH₄ Emissions from Abandoned Underground Coal Mines (MMT CO₂ Eq. and Percent)

Same	6	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a					
Source	Gas	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Abandoned Underground Coal Mines	CH ₄	6.4	5.0	7.7	-22%	+21%		

^a Range of emission estimates predicted by Monte Carlo Simulation for a 95 percent confidence interval.

QA/QC and Verification

In order to ensure the quality of the emission estimates for abandoned coal mines, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and reported emissions data used for estimating emissions from abandoned coal mines. Trends across the time series were analyzed to determine whether any corrective actions were needed.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 245 of 1050 PageID 3693

Recalculations Discussion

For the current Inventory, estimates of CO₂-equivalent CH₄ emissions from abandoned coal mines have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ increased from 25 to 28, leading to an overall increase in CO₂-equivalent CH₄ emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO₂-equivalent CH₄ emissions was 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the Inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

3.6 Petroleum Systems (CRF Source Category 1B2a)

This IPCC category (1B2a) is for fugitive emissions from petroleum systems, which per IPCC guidelines include emissions from leaks, venting, and flaring. Methane emissions from petroleum systems are primarily associated with onshore and offshore crude oil exploration, production, transportation, and refining operations. During these activities, CH₄ is released to the atmosphere as emissions from leaks, venting (including emissions from operational upsets), and flaring. Carbon dioxide emissions from petroleum systems are primarily associated with onshore and offshore crude oil production and refining operations. Note, CO2 emissions in petroleum systems exclude all combustion emissions (e.g., engine combustion) except for flaring CO₂ emissions. All combustion CO₂ emissions (except for flaring) are accounted for in the fossil fuel combustion chapter (see Section 3.1). Emissions of N₂O from petroleum systems are primarily associated with flaring. Total greenhouse gas emissions (CH₄, CO₂, and N₂O) from petroleum systems in 2021 were 74.9 MMT CO₂ Eq., an increase of 23 percent from 1990, primarily due to increases in CO2 emissions. Total emissions increased by 10 percent from 2010 levels and have decreased by 10 percent since 2020. Total CO₂ emissions from petroleum systems in 2021 were 24.67 MMT CO₂ (24,669 kt CO₂), 2.6 times higher than in 1990. Total CO₂ emissions in 2021 were 1.8 times higher than in 2010 and 15 percent lower than in 2020. Total CH₄ emissions from petroleum systems in 2021 were 50.2 MMT CO₂ Eq. (1,791 kt CH₄), a decrease of 2 percent from 1990. Since 2010, total CH₄ emissions decreased by 8 percent; and since 2020, CH₄ emissions decreased by 8 percent. Total N₂O emissions from petroleum systems in 2021 were 0.022 MMT CO₂ Eq. (0.082 kt N₂O), 1.7 times higher than in 1990, 1.2 times higher than in 2010, and 34 percent lower than in 2020. Since 1990, U.S. oil production has increased by 46 percent. In 2021, U.S. oil production was 146 percent higher than in 2010 and 1 percent lower than in 2020.

Each year, some estimates in the Inventory are recalculated with improved methods and/or data. These improvements are implemented consistently across the entire Inventory's time series (i.e., 1990 to 2021) to ensure that the trend is representative of changes in emissions levels. Recalculations in petroleum systems in this year's Inventory include:

- Updates to oil and gas production volumes using the most recent data from the United States Energy Information Administration (EIA)
- Recalculations due to Greenhouse Gas Reporting Program (GHGRP) submission revisions
- Recalculations due to methodological updates to four onshore production segment sources pneumatic controllers, equipment leaks, chemical injection pumps, and storage tanks.
- Recalculations due to updating the global warming potential (GWP) for CH₄ and N₂O to use AR5 values.

The Recalculations Discussion section below provides more details on the updated methods.

Exploration. Exploration includes well drilling, testing, and completion. Exploration accounts for less than 0.5 percent of total CH₄ emissions (including leaks, vents, and flaring) from petroleum systems in 2021. The predominant sources of CH₄ emissions from exploration are hydraulically fractured oil well completions. Other sources include well testing, well drilling, and well completions without hydraulic fracturing. Since 1990, exploration CH₄ emissions have decreased 96 percent, and while the number of hydraulically fractured wells completed increased 64 percent, there were decreases in the fraction of such completions without reduced emissions completions (RECs) or flaring. Emissions of CH₄ from exploration were highest in 2012, over 60 times higher than in 2021; and lowest in 2021. Emissions of CH₄ from exploration decreased 52 percent from 2020 to 2021, due to a decrease in emissions from hydraulically fractured oil well completions without RECs, as well as due to hydraulically fractured oil well completions with RECs and venting. Exploration accounts for 2 percent of total CO₂ emissions (including leaks, vents, and flaring) from petroleum systems in 2021. Emissions of CO₂ from exploration in 2021 were 28 percent higher than in 1990, and decreased by 44 percent from 2020, largely due to a decrease in the number of hydraulically fractured oil well completions without RECS or flaring (by 36 percent from 2020). Emissions of CO₂ from exploration were highest in 2014, over 8 times higher than in 2021. Exploration accounts for 1 percent of total N₂O emissions from petroleum systems in 2021. Emissions of N₂O from exploration in 2021 are 35 percent higher than in 1990, and 39 percent lower than in 2020, due to the above-mentioned changes in hydraulically fractured oil well completions with flaring.

Production. Production accounts for 98 percent of total CH4 emissions (including leaks, vents, and flaring) from petroleum systems in 2021. The predominant sources of emissions from production field operations are pneumatic controllers, offshore oil platforms, equipment leaks, chemical injection pumps, gas engines, produced water, and associated gas flaring. In 2021, these seven sources together accounted for 94 percent of the CH₄ emissions from production. Since 1990, CH₄ emissions from production have increased by 6 percent primarily due to increases in emissions from pneumatic devices. Overall, production segment CH₄ emissions decreased by 8 percent from 2020 levels due primarily to lower pneumatic controller emissions. The number of high- and intermittent-bleed pneumatic controllers decreased from 2020 to 2021 whereas, the number of low-bleed pneumatic controllers increased from 2020 to 2021. Production emissions account for 81 percent of the total CO2 emissions (including leaks, vents, and flaring) from petroleum systems in 2021. The principal sources of CO2 emissions are associated gas flaring, miscellaneous production flaring, and oil tanks with flares. In 2021, these three sources together accounted for 97 percent of the CO₂ emissions from production. In 2021, CO₂ emissions from production were 3.4 times higher than in 1990, due to increases in flaring emissions from associated gas flaring, miscellaneous production flaring, and tanks. Overall, in 2021, production segment CO₂ emissions decreased by 17 percent from 2020 levels primarily due to decreases in associated gas flaring and miscellaneous production flaring in the Permian and Williston Basins. Production emissions accounted for 48 percent of the total N₂O emissions from petroleum systems in 2021. The principal sources of N₂O emissions are associated gas flaring, oil tanks with flares, miscellaneous production flaring, and offshore flaring. In 2021, N₂O emissions from production were 115 percent higher than in 1990 and were 51 percent lower than in 2020.

Crude Oil Transportation. Emissions from crude oil transportation account for a very small percentage of the total emissions (including leaks, vents, and flaring) from petroleum systems. Crude oil transportation activities account for 0.4 percent of total CH₄ emissions from petroleum systems. Emissions from tanks, marine loading, and truck loading operations account for 78 percent of CH₄ emissions from crude oil transportation. Since 1990, CH₄ emissions from transportation have increased by 21 percent. In 2021, CH₄ emissions from transportation decreased by 3 percent from 2020 levels. Crude oil transportation activities account for less than 0.01 percent of total CO₂ emissions from petroleum systems. Emissions from tanks, marine loading, and truck loading operations account for 78 percent of CO₂ emissions from crude oil transportation.

Crude Oil Refining. Crude oil refining processes and systems account for 2 percent of total fugitive (including leaks, vents, and flaring) CH₄ emissions from petroleum systems. This low share is because most of the CH₄ in crude oil is removed or escapes before the crude oil is delivered to the refineries. There is a negligible amount of CH₄ in all refined products. Within refineries, flaring accounts for 52 percent of the CH₄ emissions, while delayed cokers, uncontrolled blowdowns, and equipment leaks account for 16, 13 and 9 percent, respectively. Fugitive CH₄ emissions from refining of crude oil have increased by 12 percent since 1990, and decreased 5 percent from 2020; however, like the transportation subcategory, this increase has had little effect on the overall emissions of CH₄

from petroleum systems. Crude oil refining processes and systems account for 17 percent of total fugitive (including leaks, vents, and flaring) CO₂ emissions from petroleum systems. Of the total fugitive CO₂ emissions from refining, almost all (about 99 percent) of it comes from flaring. ⁷⁰ Since 1990, refinery fugitive CO₂ emissions increased by 28 percent and have decreased by less than 1 percent from the 2020 levels, due to a decrease in flaring. Flaring occurring at crude oil refining processes and systems accounts for 51 percent of total fugitive N₂O emissions from petroleum systems. In 2021, refinery fugitive N₂O emissions increased by 37 percent since 1990, and decreased by less than 1 percent from 2020 levels.

Table 3-43: Total Greenhouse Gas Emissions (CO₂, CH₄, and N₂O) from Petroleum Systems (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	4.7	6.3	2.3	3.8	2.9	1.2	0.6
Production	52.0	50.1	79.3	88.2	97.6	77.1	68.9
Transportation	0.2	0.1	0.2	0.2	0.3	0.2	0.2
Crude Refining	4.0	4.6	4.5	4.6	6.0	5.1	5.1
Total	60.8	61.2	86.4	96.8	106.8	83.6	74.9

Table 3-44: CH₄ Emissions from Petroleum Systems (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	4.3	5.9	0.5	0.6	0.5	0.3	0.2
Production	46.1	44.0	60.3	59.0	58.2	53.0	48.9
Pneumatic Controllers	21.3	23.3	38.1	35.3	24.8	31.7	28.4
Offshore Production	9.9	7.2	5.7	5.5	5.5	5.3	5.5
Equipment Leaks	2.3	2.9	3.3	3.7	3.9	3.2	3.3
Gas Engines	2.3	2.0	2.5	2.6	2.6	2.5	2.5
Produced Water	2.6	1.7	2.4	2.6	2.7	2.5	2.5
Chemical Injection Pumps	1.3	3.0	3.4	3.9	10.8	3.3	3.2
Assoc Gas Flaring	0.5	0.4	1.1	1.9	2.3	1.2	0.8
Other Sources	5.9	3.5	3.7	3.6	5.5	3.5	2.8
Crude Oil Transportation	0.2	0.1	0.2	0.2	0.3	0.2	0.2
Refining	0.7	0.8	0.9	0.8	1.0	0.9	0.8
Total	51.3	50.9	61.9	60.6	59.9	54.5	50.2

Table 3-45: CH₄ Emissions from Petroleum Systems (kt CH₄)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	154	211	17	20	16	12	6
Production	1,646	1,573	2,152	2,107	2,078	1,894	1,748
Pneumatic Controllers	760	833	1,362	1,260	886	1,131	1,015
Offshore Production	353	259	205	197	196	188	195
Equipment Leaks	82	102	120	132	138	115	117
Gas Engines	82	71	89	92	94	89	89
Produced Water	91	62	84	93	98	89	89
Chemical Injection Pumps	47	105	121	139	387	116	116
Assoc Gas Flaring	20	14	38	66	82	43	28
Other Sources	211	125	133	128	197	124	99
Crude Oil Transportation	7	5	8	8	9	8	8

70 Petroleum Systems includes fugitive emissions (leaks, venting, and flaring). In many industries, including petroleum refineries, the largest source of onsite CO₂ emissions is often fossil fuel combustion, which is covered in Section 3.1 of this chapter.

Refining	26	30	33	30	36	31	30
Total	1,833	1,819	2,209	2,165	2,138	1,945	1,791

Table 3-46: CO₂ Emissions from Petroleum Systems (MMT CO₂)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	0.4	0.4	1.9	3.2	2.4	0.8	0.5
Production	5.9	6.1	19.0	29.2	39.4	24.0	20.0
Transportation	+	+	+	+	+	+	+
Crude Refining	3.3	3.7	3.6	3.7	5.0	4.2	4.2
Total	9.5	10.2	24.5	36.1	46.9	29.1	24.7

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Table 3-47: CO₂ Emissions from Petroleum Systems (kt CO₂)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	364	395	1,853	3,208	2,434	838	467
Production	5,869	6,097	19,025	29,187	39,429	24,000	19,985
Transportation	0.9	0.7	1.1	1.2	1.3	1.2	1.1
Crude Refining	3,284	3,728	3,582	3,706	5,009	4,242	4,216
Total	9,519	10,221	24,462	36,102	46,874	29,081	24,669

Table 3-48: N₂O Emissions from Petroleum Systems (Metric Tons CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	161	174	722	1,338	894	361	219
Production	4,907	5,465	13,450	25,638	26,522	21,665	10,539
Transportation	NE						
Crude Refining	8,096	9,189	9,286	9,351	13,127	11,149	11,088
Total	13,164	14,827	23,458	36,327	40,542	33,175	21,846
NE (Not Estimated)							

Table 3-49: N₂O Emissions from Petroleum Systems (Metric Tons N₂O)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	0.6	0.7	2.7	5.0	3.4	1.4	0.8
Production	18.5	20.6	50.8	96.7	100.1	81.8	39.8
Transportation	NE	NE	NE	NE	NE	NE	NE
Crude Refining	30.5	34.7	35.0	35.3	49.5	42.1	41.8
Total	49.7	56.0	88.5	137.1	153.0	125.2	82.4

NE (Not Estimated)

Methodology and Time-Series Consistency

See Annex 3.5 for the full time series of emissions data, activity data, emission factors, and additional information on methods and data sources.

Petroleum systems includes emission estimates for activities occurring in petroleum systems from the oil wellhead through crude oil refining, including activities for crude oil exploration, production field operations, crude oil

transportation activities, and refining operations. Generally, emissions are estimated for each activity by multiplying emission factors (e.g., emission rate per equipment or per activity) by corresponding activity data (e.g., equipment count or frequency of activity). Certain sources within petroleum refineries are developed using an IPCC Tier 3 approach (i.e., all refineries in the nation report facility-level emissions data to the GHGRP, which are included directly in the national emissions estimates here). Other estimates are developed with a Tier 2 approach. Tier 1 approaches are not used.

EPA received stakeholder feedback on updates in the Inventory through EPA's stakeholder process on oil and gas in the Inventory. Stakeholder feedback is noted below in Recalculations Discussion and Planned Improvements. More information on the stakeholder process can be found online. 71

Emission Factors. Key references for emission factors include Methane Emissions from the Natural Gas Industry by the Gas Research Institute and EPA (GRI/EPA 1996), Estimates of Methane Emissions from the U.S. Oil Industry (EPA 1999), Compilation of Air Pollutant Emission Factors, AP-42 (EPA 1997), Global Emissions of Methane from Petroleum Sources (API 1992), consensus of industry peer review panels, Bureau of Ocean Energy Management (BOEM) reports, Nonpoint Oil and Gas Emission Estimation Tool (EPA 2017), and analysis of GHGRP data (EPA 2022).

Emission factors for hydraulically fractured (HF) oil well completions and workovers (in four control categories) were developed using EPA's GHGRP data; year-specific data were used to calculate emission factors from 2016forward and the year 2016 emission factors were applied to all prior years in the time series. The emission factors for well testing and associated gas venting and flaring were developed using year-specific GHGRP data for years 2015 forward; earlier years in the time series use 2015 emission factors. For miscellaneous production flaring, year-specific emission factors were developed for years 2015 forward from GHGRP data, an emission factor of 0 (assumption of no flaring) was assumed for 1990 through 1992, and linear interpolation was applied to develop emission factors for 1993 through 2014. For more information, please see memoranda available online. 72 For offshore oil production, emission factors were calculated using BOEM data for offshore facilities in federal waters of the Gulf of Mexico (and these data were also applied to facilities located in state waters of the Gulf of Mexico) and GHGRP data for offshore facilities off the coasts of California and Alaska. For many other sources, emission factors were held constant for the period 1990 through 2021, and trends in emissions reflect changes in activity levels. Emission factors from EPA 1999 are used for all other production and transportation activities.

For associated gas venting and flaring and miscellaneous production flaring, emission factors were developed on a production basis (i.e., emissions per unit oil produced). Additionally, for these two sources, basin-specific activity and emission factors were developed for each basin that in any year from 2011 forward contributed at least 10 percent of total source emissions (on a CO₂ Eq. basis) in the GHGRP. For associated gas venting and flaring, basinspecific factors were developed for four basins: Williston, Permian, Gulf Coast, and Anadarko. For miscellaneous production flaring, basin-specific factors were developed for three basins: Williston, Permian, and Gulf Coast. For each source, data from all other basins were combined, and activity and emission factors were developed for the other basins as a single group.

For pneumatic controllers and tanks, basin-specific emission factors were calculated for all the basins reporting to the GHGRP. These emission factors were calculated for all the years with applicable GHGRP data (i.e., 2011 - 2021 or 2015 - 2021). For the remaining basins (i.e., basins not reporting to the GHGRP), subpart W average emission factors were used. For more information, please see memoranda available online.³

For the exploration and production segments, in general, CO2 emissions for each source were estimated with GHGRP data or by multiplying CO₂ content factors by the corresponding CH₄ data, as the CO₂ content of gas relates to its CH₄ content. Sources with CO₂ emission estimates calculated using GHGRP data include HF completions and workovers, associated gas venting and flaring, tanks, well testing, pneumatic controllers, chemical injection pumps, miscellaneous production flaring, and certain offshore production facilities (those located off the coasts of

⁷¹ See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

⁷² See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

California and Alaska). For these sources, CO₂ was calculated using the same methods as used for CH₄. Carbon dioxide emission factors for offshore oil production in the Gulf of Mexico were derived using data from BOEM, following the same methods as used for CH₄ estimates. For other sources, the production field operations emission factors for CO₂ are generally estimated by multiplying the CH₄ emission factors by a conversion factor, which is the ratio of CO₂ content and CH₄ content in produced associated gas.

For the exploration and production segments, N_2O emissions were estimated for flaring sources using GHGRP or BOEM OGOR-B data and the same method used for CO_2 . Sources with N_2O emissions in the exploration segment include well testing and HF completions with flaring. Sources with N_2O emissions in the production segment include associated gas flaring, tank flaring, miscellaneous production flaring, HF workovers with flaring, and flaring from offshore production sources.

For crude oil transportation, emission factors for CH_4 were largely developed using data from EPA (1997), API (1992), and EPA (1999). Emission factors for CO_2 were estimated by multiplying the CH_4 emission factors by a conversion factor, which is the ratio of CO_2 content and CH_4 content in whole crude post-separator.

For petroleum refining activities, year-specific emissions from 2010 forward were directly obtained from EPA's GHGRP. All U.S. refineries have been required to report CH_4 , CO_2 , and N_2O emissions for all major activities starting with emissions that occurred in 2010. The reported total CH_4 , CO_2 , and N_2O emissions for each activity was used for the emissions in each year from 2010 forward. To estimate emissions for 1990 to 2009, the 2010 to 2013 emissions data from GHGRP along with the refinery feed data for 2010 to 2013 were used to derive CH_4 and CO_2 emission factors (i.e., sum of activity emissions/sum of refinery feed) and 2010 to 2017 data were used to derive N_2O emission factors; these emission factors were then applied to the annual refinery feed in years 1990 to 2009. GHGRP delayed coker CH_4 emissions for 2010 through 2017 were increased using the ratio of certain reported emissions for 2018 to 2017, to account for a more accurate GHGRP calculation methodology that was implemented starting in reporting year 2018.

A complete list of references for emission factors and activity data by emission source is provided in Annex 3.5.

Activity Data. References for activity data include Enverus data (Enverus 2021), Energy Information Administration (EIA) reports, Methane Emissions from the Natural Gas Industry by the Gas Research Institute and EPA (EPA/GRI 1996), Estimates of Methane Emissions from the U.S. Oil Industry (EPA 1999), consensus of industry peer review panels, BOEM reports, the Oil & Gas Journal, the Interstate Oil and Gas Compact Commission, the United States Army Corps of Engineers, and analysis of GHGRP data (EPA 2022). Enverus data for 2021 were not available; this version of the Inventory uses 2020 data as proxy for 2021.

For pneumatic controllers, equipment leaks, chemical injection pumps, and tanks, basin-specific activity factors were calculated for all the basins reporting to the GHGRP. These factors were calculated for all the years with applicable GHGRP data (i.e., 2011 through 2021 or 2015 through 2021). For the remaining basins (i.e., basins not reporting to the GHGRP), GHGRP average activity factors were used. For more information, please see memoranda available online.⁷³

For many sources, complete activity data were not available for all years of the time series. In such cases, one of three approaches was employed to estimate values, consistent with IPCC good practice. Where appropriate, the activity data were calculated from related statistics using ratios developed based on EPA/GRI (1996) and/or GHGRP data. In some cases, activity data are developed by interpolating between recent data points (such as from GHGRP) and earlier data points, such as from EPA/GRI (1996). Lastly, in limited instances the previous year's data were used if current year data were not yet available.

A complete list of references for emission factors and activity data by emission source is provided in Annex 3.5. The United States reports data to the UNFCCC using this Inventory report along with Common Reporting Format (CRF) tables. This note is provided for those reviewing the CRF tables: The notation key "IE" is used for CO_2 and CH_4 emissions from venting and flaring in CRF table 1.B.2. Disaggregating flaring and venting estimates across the

_

⁷³ See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

Inventory would involve the application of assumptions and could result in inconsistent reporting and, potentially, decreased transparency. Data availability varies across segments within oil and gas activities systems, and emission factor data available for activities that include flaring can include emissions from multiple sources (flaring, venting and leaks).

As noted above, EPA's GHGRP data, available starting in 2010 for refineries and in 2011 for other sources, have improved estimates of emissions from petroleum systems. Many of the previously available datasets were collected in the 1990s. To develop a consistent time series for sources with new data, EPA reviewed available information on factors that may have resulted in changes over the time series (e.g., regulations, voluntary actions) and requested stakeholder feedback on trends as well. For most sources, EPA developed annual data for 1993 through 2009 or 2014 by interpolating activity data or emission factors or both between 1992 (when GRI/EPA data are available) and 2010 or 2015 data points. Information on time-series consistency for sources updated in this year's Inventory can be found in the Recalculations Discussion below, with additional detail provided in supporting memos (relevant memos are cited in the Recalculations Discussion). For information on other sources, please see the Methodology Discussion above and Annex 3.5.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

EPA conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo Simulation technique) to characterize uncertainty for petroleum systems. For more information on the approach, please see the memoranda *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Natural Gas and Petroleum Systems Uncertainty Estimates* and *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Update for Natural Gas and Petroleum Systems CO_2 Uncertainty Estimates.*

EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around CH₄ and CO₂ emissions from petroleum systems for the current Inventory. For the CH₄ uncertainty analysis, EPA focused on the five highest methane-emitting sources for the year 2021, which together emitted 75 percent of methane from petroleum systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. For the CO₂ uncertainty analysis, EPA focused on the three highest-emitting sources for the year 2021 which together emitted 78 percent of CO₂ from petroleum systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." As a result, the understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve. The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification. To estimate uncertainty for N₂O, EPA applied the uncertainty bounds calculated for CO2. EPA will seek to refine this estimate in future Inventories.

The results presented below provide the 95 percent confidence bound within which actual emissions from this source category are likely to fall for the year 2021, using the recommended IPCC methodology. The results of the Approach 2 uncertainty analysis are summarized in Table 3-50. Petroleum systems CH₄ emissions in 2021 were estimated to be between 44.5 and 57.0 MMT CO₂ Eq., while CO₂ emissions were estimated to be between 21.3 and 29.2 MMT CO₂ Eq. at a 95 percent confidence level. Petroleum systems N₂O emissions in 2021 were estimated to be between 0.019 and 0.026 MMT CO₂ Eq. at a 95 percent confidence level. The basin-specific updates to activity factors and emissions factors discussed elsewhere impacted the uncertainty results when compared to the

74 See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

uncertainty analysis in the previous Inventory. The second highest emitting methane source in 2021, pneumatic controllers, included an updated approach to estimate emissions that analyzed basin-level data. EPA modeled uncertainty at the basin level as well for this source. The increased granularity in modelling led to an overall decrease in the uncertainty bounds.

Uncertainty bounds for other years of the time series have not been calculated, but uncertainty is expected to vary over the time series. For example, years where many emission sources are calculated with interpolated data would likely have higher uncertainty than years with predominantly year-specific data. In addition, the emission sources that contribute the most to CH₄ and CO₂ emissions are different over the time series, particularly when comparing recent years to early years in the time series. For example, associated gas venting emissions were higher and flaring emissions were lower in early years of the time series, compared to recent years. Technologies also changed over the time series (e.g., reduced emissions completions were not used early in the time series).

Table 3-50: Approach 2 Quantitative Uncertainty Estimates for CH₄ and CO₂ Emissions from Petroleum Systems (MMT CO₂ Eq. and Percent)

Course	Coo	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a						
Source	Gas	(MMT CO ₂ Eq.)b	(MMT C	O ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Petroleum Systems	CH ₄	50.2	44.5	57.0	-10%	+15%			
Petroleum Systems	CO_2	24.7	21.3	29.2	-13%	+19%			
Petroleum Systems	N_2O	0.022	0.019	0.026	-13%	+19%			

^a Range of emission estimates estimated by applying the 95 percent confidence intervals obtained from the Monte Carlo Simulation analysis conducted for the year 2021 CH₄ and CO₂ emissions.

QA/QC and Verification Discussion

The petroleum systems emission estimates in the Inventory are continually being reviewed and assessed to determine whether emission factors and activity factors accurately reflect current industry practices. A QA/QC analysis was performed for data gathering and input, documentation, and calculation. QA/QC checks are consistently conducted to minimize human error in the emission calculations. EPA performs a thorough review of information associated with new studies, GHGRP data, regulations, public webcasts, and the Natural Gas STAR Program to assess whether the assumptions in the Inventory are consistent with current industry practices. EPA has a multi-step data verification process for GHGRP data, including automatic checks during data-entry, statistical analyses on completed reports, and staff review of the reported data. Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred.⁷⁵

As in previous years, EPA conducted early engagement and communication with stakeholders on updates prior to public review of the current Inventory. EPA held stakeholder webinars on greenhouse gas data for oil and gas in September and November of 2022. EPA released memos detailing updates under consideration and requesting stakeholder feedback. Stakeholder feedback received through these processes is discussed in the Recalculations Discussion and Planned Improvements sections below.

In recent years, several studies have measured emissions at the source level and at the national or regional level and calculated emission estimates that may differ from the Inventory. There are a variety of potential uses of data from new studies, including replacing a previous estimate or factor, verifying or QA of an existing estimate or

^b All reported values are rounded after calculation. As a result, lower and upper bounds may not be duplicable from other rounded values as shown in table.

⁷⁵ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

factor, and identifying areas for updates. In general, there are two major types of studies related to oil and gas greenhouse gas data: studies that focus on measurement or quantification of emissions from specific activities, processes, and equipment, and studies that use tools such as inverse modeling to estimate the level of overall emissions needed to account for measured atmospheric concentrations of greenhouse gases at various scales. The first type of study can lead to direct improvements to or verification of Inventory estimates. In the past few years, EPA has reviewed, and in many cases, incorporated data from these data sources. The second type of study can provide general indications on potential over- and under-estimates.

A key challenge in using these types of studies to assess Inventory results is having a relevant basis for comparison (e.g., the two data sets should have comparable time frames and geographic coverage, and the independent study should assess data from the Inventory and not another data set, such as the Emissions Database for Global Atmospheric Research, or "EDGAR"). In an effort to improve the ability to compare the national-level Inventory with measurement results that may be at other spatial and temporal scales, a team at Harvard University along with EPA and other coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1 degree x 0.1 degree spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization. ⁷⁶ The gridded methane inventory is designed to be consistent with the U.S. EPA's Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014 estimates for the year 2012, which presents national totals. 77 An updated version of the gridded inventory is being developed and will improve efforts to compare results of the inventory with atmospheric studies.

As discussed above, refinery emissions are quantified by using the total emissions reported to GHGRP for the refinery emission categories included in Petroleum Systems. Subpart Y has provisions that refineries are not required to report under Subpart Y if their emissions fall below certain thresholds. Each year, a review is conducted to determine whether an adjustment is needed to the Inventory emissions to include emissions from refineries that stopped reporting to the GHGRP. Based on the review of the most recent GHGRP data, EPA identified 4 refineries that reported in the past, but have stopped reporting to GHGRP. One of these refineries last reported to GHGRP in 2012 and the remaining 3 refineries last reported in 2020. EPA used the last reported emissions for these refineries as proxy to gap fill annual emissions for 2013 through 2021 for these refineries, as applicable.

Recalculations Discussion

EPA received information and data related to the emission estimates through GHGRP reporting and stakeholder feedback on updates under consideration. In October 2022 and February 2023, EPA released draft memoranda that discussed changes under consideration and requested stakeholder feedback on those changes. ⁷⁸ Feedback received is discussed in the Planned Improvements section below. Memoranda cited in the Recalculations Discussion below are: Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data (Disaggregation memo) and Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data for the Production Segment (Production Disaggregation memo).

In this Inventory, an update that incorporates additional basin-level data from GHGRP subpart W was implemented for several emission sources in the onshore production segment. The update seeks to improve the ability of EPA's gridded and state inventories to reflect variation due to differences in formation types, technologies and practices, regulations, or voluntary initiatives, and not only the differences in key activity levels that are reflected in the current gridded and state inventories. This would allow EPA to use the gridded inventory for improved comparisons of the national Inventory with various atmospheric observation studies (since regions will better reflect the local differences in emissions rates as reported to GHGRP) and would allow the state-level inventory to

⁷⁶ See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

⁷⁷ See https://www.epa.gov/ghgemissions/us-greenhouse-gas-inventory-report-1990-2014.

 $^{^{78}}$ Stakeholder materials including draft memoranda for the current (i.e., 1990 to 2021) Inventory are available at https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

reflect differences in state-level programs, formation type mixes, and varying technologies and practices. For many sources, an approach that develops estimates using geographically disaggregated data may not be possible or preferable to a national level approach based on the currently available data. For some emission sources in the Inventory, emission factor data come from research studies and are applied at the national level. For example, many of the emission factors used to quantify emissions in the Inventory for the gathering and boosting, transmission and storage, distribution, and post-meter segments are from research studies and do not have a level of detail or total population comparable to GHGRP. For petroleum refineries, because there is no reporting threshold for GHGRP Subpart Y, facility-level data are generally available for all refineries in the United States, and these site-specific data are already used to develop the gridded and state-level greenhouse gas estimates. Even in cases where geographically disaggregated data are available, such an approach may not always be preferable. In cases with limited variation between areas, such an approach would have limited impact on emissions estimates regionally or nationally. In cases with limited data in certain areas, disaggregated approaches might substantially increase the uncertainty of estimates and basin-specific calculations would not be an improvement over use of a national average. EPA continues to seek stakeholder feedback on the draft approach in this Inventory.

EPA evaluated relevant information available and made several updates to the Inventory, including for pneumatic controllers, equipment leaks, chemical injection pumps, and storage tanks. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. General information for these source specific recalculations are presented below and details (including the basin-specific emissions estimates) are available in the *Disaggregation* memo and *Production Disaggregation* memo.

In addition to the updates to production segment sources mentioned above, for certain sources, CH_4 and/or CO_2 emissions changed by greater than 0.05 MMT CO_2 Eq., comparing the previous estimate for 2020 to the current (recalculated) estimate for 2020. The emissions changes were mostly due to GHGRP data submission revisions. These sources are discussed below and include associated gas flaring, miscellaneous production flaring, offshore production, and refinery flaring.

In addition, for the current Inventory, CO₂-equivalent emissions totals have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ has increased from 25 to 28, leading to an increase in the calculated CO₂-equivalent emissions of CH₄, while the GWP of N₂O has decreased from 298 to 265, leading to a decrease in the calculated CO₂-equivalent emissions of N₂O. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

The combined impact of revisions to 2020 petroleum systems CH_4 emission estimates on a CO_2 -equivalent basis, compared to the previous Inventory, is an increase from 40.2 to 54.5 MMT CO_2 Eq. (14.2 MMT CO_2 Eq., or 35 percent), or an increase from 1,609 kt CH_4 to 1,945 kt CH_4 or 21 percent. The recalculations resulted in higher CH_4 emission estimates on average across the 1990 through 2020 time series, compared to the previous Inventory, by 11.0 MMT CO_2 Eq., or 25 percent, or by 204 kt CH_4 or 12 percent.

The combined impact of revisions to 2020 petroleum systems CO_2 emission estimates, compared to the previous Inventory, is a decrease from 30.2 to 29.1 MMT CO_2 (1.1 MMT CO_2 , or 4 percent). The recalculations resulted in lower emission estimates on average across the 1990 through 2020 time series, compared to the previous Inventory, by 1.2 MMT CO_2 Eq., or 9 percent.

The combined impact of revisions to 2020 petroleum systems N_2O emission estimates on a CO_2 -equivalent basis, compared to the previous Inventory, is a decrease of 0.004 MMT CO_2 , Eq. or 12 percent, (or a decrease of less than 1 percent comparing on a kt N_2O basis). The recalculations resulted in an average decrease in emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 0.002 MMT CO_2 Eq., or 11 percent, (or a decrease of less than 1 percent comparing on a kt N_2O basis).

In Table 3-51 and Table 3-52 below are categories in Petroleum Systems with updated methodologies or with recalculations resulting in a change of greater than 0.05 MMT CO₂ Eq., comparing the previous estimate for 2020 to the current (recalculated) estimate for 2020. For more information, please see the discussion below.

For certain sources, CH₄ emissions for 2020 changed by greater than 0.05 MMT CO₂ Eq., compared to the previous Inventory due to the use of the updated GWP value (AR5). These sources are not discussed below and include associated gas venting and flaring, produced water, gas engines, heaters, and refineries.

Table 3-51: Recalculations of CO₂ in Petroleum Systems (MMT CO₂)

	Previous Estimate	Current Estimate	Current Estimate
Commont/Commo	Year 2020,	Year 2020,	Year 2021,
Segment/Source	2022 Inventory	2023 Inventory	2023 Inventory
Exploration	0.9	0.8	0.5
Production	25.0	24.0	20.0
Tanks	6.5	5.3	5.4
Pneumatic Controllers	0.1	0.1	0.1
Equipment Leaks	+	+	+
Chemical Injection Pumps	+	+	+
Associated Gas Flaring	13.0	13.3	9.6
Miscellaneous Production Flaring	4.6	4.7	4.2
Transportation	+	+	+
Refining	4.3	4.2	4.2
Flares	4.3	4.2	4.2
Petroleum Systems Total	30.2	29.1	24.7

⁺ Does not exceed 0.05 MMT CO₂.

Table 3-52: Recalculations of CH₄ in Petroleum Systems (MMT CO₂ Eq.)

	Previous Estimate	Current Estimate	Current Estimate
Segment/Source	Year 2020,	Year 2020,	Year 2021,
Segment/Source	2022 Inventory	2023 Inventory	2023 Inventory
Exploration	0.3	0.3	0.2
Production	38.9	53.0	48.9
Tanks	0.7	0.8	0.6
Pneumatic Controllers	21.3	31.7	28.4
Equipment Leaks	2.4	3.2	3.3
Chemical Injection Pumps	1.9	3.3	3.2
Miscellaneous Production Flaring	0.4	0.6	0.5
Offshore Production	4.8	5.3	5.5
Transportation	0.2	0.2	0.2
Refining	0.8	0.9	0.8
Petroleum Systems Total	40.2	54.5	50.2

Exploration

Recalculations for the exploration segment have resulted in lower calculated CH₄ and CO₂ emissions over the time series (less than 0.1 percent), compared to the previous Inventory.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 256 of 1050 PageID 3704

Production

Pneumatic Controllers (Methodological Update)

EPA updated the calculation methodology for pneumatic controllers to use basin-specific activity factors and emission factors calculated from subpart W data for each type of controller (i.e., high, intermittent, and low bleed). Previously, national average activity and emission factors calculated using subpart W data were applied to estimate pneumatic controller emissions. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH₄ emission factors for all basins that reported subpart W data. The factors were year-specific for RY2011 through RY2021. EPA retained the previous Inventory's activity factor assumptions for 1990 through 1993 and applied linear interpolation between the 1993 and 2011 activity factors at the basin-level. Year 2011 emission factors were applied to all prior years for each basin. For basins without Subpart W data available, EPA applied national average activity and emission factors.

The estimation methodology for CO_2 emissions was not updated to use the basin-specific approach for this version of the Inventory. CO_2 emissions were estimated by applying a CO_2 to CH_4 ratio to the estimated CH_4 emissions.

As a result of this methodological update, CH₄ emissions estimates are an average of 22 percent higher across the time-series and 32 percent higher in 2020, compared to the previous Inventory. The most significant changes are in recent years, 2013 through 2020, due specifically to changes in intermittent bleed controller emissions estimates. Certain basins (e.g., Anadarko Basin, Appalachian, Appalachian Basin (Eastern Overthrust), Bend Arch, Fort Worth Syncline, Gulf Coast, and Sedgwick) have higher activity factors (mainly the average number of controllers per well) and/or emission factors for intermittent bleed pneumatic controllers, compared to the national average. Some of these basins also exhibit large changes in emissions over these recent years.

Table 3-53: Pneumatic Controllers National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
High Bleed Controllers	708,800	493,011	89,472	73,438	73,278	87,884	48,202
Low Bleed Controllers	51,170	63,773	20,104	31,779	50,456	36,752	46,360
Intermittent Bleed Controllers	0	276,145	1,252,028	1,155,041	762,647	1,006,263	920,518
Total Emissions	759,970	832,929	1,361,605	1,260,259	886,382	1,130,899	1,015,080
Previous Estimate	736,447	708,680	835,129	727,365	732,092	853,562	NA

NA (Not Applicable)

Equipment Leaks (Methodological Update)

EPA updated the calculation methodology for onshore production equipment leaks to use basin-specific equipment-level activity factors (e.g., separators/well) from GHGRP data. Previously, national average equipment activity factors developed using RY2014 GHGRP data were used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific equipment-level activity factors for all basins that reported subpart W data. The factors were year-specific for RY2015 through RY2021. EPA retained the previous Inventory's activity factors for 1990 through 1993 and used linear interpolation between the 1993 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied national average activity factors using all subpart W data. This methodological update applies only for activity factors. The previous Inventory's CH₄ emission factors for onshore production segment equipment leaks (by equipment type) were retained and used to develop CH₄ estimates.

This update resulted in CH₄ emissions an average of 18 percent higher across the time-series compared with the previous Inventory and a 21 percent higher estimate for 2020, compared to the previous Inventory. The emissions increase is due to certain basins having higher activity factors compared to the national average activity factors (e.g., Anadarko, Appalachian, Appalachian Basin (Eastern Overthrust), and Gulf Coast).

Table 3-54: Production Equipment Leaks National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Oil Wellheads	56,524	51,563	60,557	59,195	60,877	58,632	60,029
Separators	10,970	17,514	30,021	42,001	38,510	29,356	27,107
Heater/Treaters	11,119	20,741	16,245	17,492	22,706	18,734	21,307
Headers	3,323	12,434	12,754	13,217	15,595	8,075	8,444
Total Emissions	81,936	102,251	119,577	131,904	137,688	114,797	116,887
Previous Estimate	81,874	86,248	100,450	99,287	98,459	94,921	NA

NA (Not Applicable)

Chemical injection Pumps (Methodological Update)

EPA updated the calculation methodology for chemical injection pumps to use basin-specific activity factors from GHGRP data. Previously, a national average activity factor developed using RY2014 GHGRP data was used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factor for all basins that reported subpart W data. The factors were year-specific for RY2015 through RY2021. EPA also retained the previous Inventory's activity factor for 1990 through 1993 and used linear interpolation between the 1993 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied the national average unweighted activity factor from all subpart W data. This methodological update applies only to activity factors. The previous Inventory's CH₄ emission factor for chemical injection pumps was retained and used to develop CH₄ estimates.

This update resulted in calculated CH₄ emissions an average of 63 percent higher across the time-series compared with the previous Inventory and 52 percent higher in 2020, compared to the previous Inventory. The emissions increase is due to certain basins having a higher activity factor compared to the national average activity factor (e.g., Anadarko Basin, Appalachian, Appalachian Basin (Eastern Overthrust), Bend Arch, Fort Worth Syncline, Green River, and Gulf Coast).

Table 3-55: Chemical Injection Pumps National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Chemical Injection Pumps	47,401	105,458	121,469	138,866	387,416	116,080	115,678
Previous Estimate	46,758	67,685	80,728	79,793	79,128	76,284	NA

NA (Not Applicable)

Storage Tanks (Methodological Update)

EPA updated the calculation methodology for production segment storage tanks to use basin-specific activity factors and emission factors, calculated from Subpart W data for each storage tank category. Previously, national annual average activity and emission factors calculated using subpart W data were applied to estimate storage tank emissions. In this update, EPA developed national emission estimates by summing calculated basin-level total emission estimates, using basin-level data emission and activity factors developed from Subpart W. The *Production Disaggregation* memo presents additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH₄ and CO₂ emission factors for all basins that reported subpart W data. The factors were year-specific for reporting year (RY) 2015 through RY2021. EPA also retained the previous

Inventory's activity factor assumptions (i.e., all oil tanks were uncontrolled in 1990) and used linear interpolation between the 1990 and 2015 activity factors at the basin-level. Year 2015 emission factors were applied to all prior years for each basin. For basins without Subpart W data available, EPA applied national average activity and emission factors (unweighted average of all Subpart W reported data).

This update resulted in oil tank CH₄ emission estimates that are on average 16 percent lower across the time series than in the previous Inventory. The CH₄ estimates for 2020 are 2 percent lower than in the previous Inventory. Oil tank CO₂ emissions are on average 55 percent lower across the time series than in the previous Inventory and 2020 emissions estimates are 20 percent lower than in the previous Inventory. The CH₄ emissions estimate decrease occurs mainly from 1990 through 2005, where there is an average decrease in calculated emissions of 39 percent, compared to the previous inventory. Oil tank CO₂ emissions have a similarly large decrease in that time frame.

The Arctic Coastal Plains Province Basin has a large impact on these earlier time series year emissions, when this basin accounts for a large percentage of total liquids production, but very little of the production in that basin is stored in tanks. Oil tank CO₂ emissions decreased in recent years of the time series due to certain basins with higher production (e.g., Denver Basin, Gulf Coast, Permian) having lower activity factors and emission factors than the national average.

Table 3-56: Storage Tanks National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	0	993	5,142	6,330	4,226	3,715	3,108
Large Tanks w/VRU	0	721	9,334	2,410	2,320	1,026	513
Large Tanks w/o Control	105,668	40,150	42,112	42,679	26,491	21,294	12,290
Small Tanks w/Flares	0	15	45	16	23	29	68
Small Tanks w/o Flares	7,438	3,448	2,991	3,326	2,755	2,709	3,598
Malfunctioning Separator Dum	р						
Valves	2,397	1,472	4,247	785	428	338	320
Total Emissions	115,503	46,799	63,871	55,546	36,243	29,112	19,896
Previous Estimate	218,419	60,186	61,098	57,412	35,266	29,613	NA

NA (Not Applicable)

Table 3-57: Storage Tanks National CO₂ Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	0	716	3,771	5,348	5,974	5,212	5,381
Large Tanks w/VRU	0	3	4	4	6	2	1
Large Tanks w/o Control	24	8	5	4	5	6	5
Small Tanks w/Flares	0	3	11	7	9	10	9
Small Tanks w/o Flares	12	5	4	5	4	4	5
Malfunctioning Separator Dump							
Valves	12	13	32	30	26	20	37
Total Emissions	47	748	3,828	5,398	6,024	5,255	5,439
Previous Estimate	115	2,505	4,313	6,189	6,682	6,537	NA

NA (Not Applicable)

Associated Gas Flaring (Recalculation with Updated Data)

Associated gas flaring CO_2 emission estimates are on average of 0.1 percent higher across the time series compared with the previous Inventory and in 2020 are 2 percent higher than in the previous Inventory. The emission changes were due to GHGRP data submission revisions.

Table 3-58: Associated Gas Flaring National CO₂ Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
220 - Gulf Coast Basin (LA, TX)	225	124	749	645	712	801	410
360 - Anadarko Basin	102	63	62	79	18	10	8
395 - Williston Basin	969	1,243	6,954	10,698	15,334	8,257	6,772
430 - Permian Basin	2,844	1,971	3,141	6,700	7,333	3,605	1,942
"Other" Basins	944	507	384	633	1,006	619	486
Total Emissions	5,084	3,908	11,291	18,756	24,403	13,293	9,619
220 - Gulf Coast Basin (LA, TX)	225	124	749	651	713	798	NA
360 - Anadarko Basin	102	63	62	79	18	10	NA
395 - Williston Basin	969	1,243	6,909	11,140	14,762	8,052	NA
430 - Permian Basin	2,844	1,971	3,141	6,711	7,227	3,558	NA
"Other" Basins	944	507	384	624	990	624	NA
Previous Estimate	5,084	3,908	11,245	19,206	23,710	13,041	NA

NA (Not Applicable)

Miscellaneous Production Flaring

Miscellaneous production flaring CO_2 emission estimates are on average 0.3 percent higher across the time series than in the previous Inventory and in 2020 are 2 percent higher than in the previous Inventory. The emission estimate changes were due to GHGRP data submission revisions.

Table 3-59: Miscellaneous Production Flaring National CO₂ Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
220 - Gulf Coast Basin (LA, TX)	0	105	509	584	616	651	787
395 - Williston Basin	0	72	537	1,701	2,643	852	882
430 - Permian Basin	0	209	1,465	1,406	4,320	2,798	2,216
"Other" Basins	0	400	551	615	646	378	270
Total Emissions	0	786	3,063	4,307	8,225	4,679	4,154
Previous Estimate	0	786	3,031	4,166	7,989	4,589	NA

NA (Not Applicable)

Miscellaneous production flaring CH_4 emission estimates are on average 2 percent higher across the time series compared with the previous inventory and in 2020 are 31 percent higher than calculated in the previous Inventory. The emission changes were due to GHGRP data submission revisions.

Table 3-60: Miscellaneous Production Flaring National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
220 - Gulf Coast Basin (LA, TX)	0	440	2,119	1,978	2,506	2,452	2,989
395 - Williston Basin	0	179	1,618	3,031	3,503	1,670	1,396
430 - Permian Basin	0	1,097	5,389	5,296	21,296	16,712	11,305
"Other" Basins	0	1,291	1,904	1,819	1,731	1,249	961
Total Emissions	0	3,008	11,030	12,124	29,037	22,082	16,650
Previous Estimate	0	3,008	10,928	11,669	22,994	16,807	NA

NA (Not Applicable)

Offshore Production (Recalculation with Updated Data)

Offshore production CH₄ emission estimates are on average less than 0.05 percent lower across the time series than in the previous Inventory. The 2020 value is 3 percent lower than in the previous Inventory. The emission changes were due to updated offshore complex counts.

Table 3-61: Offshore Production National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Source	1330	2005	2017	2010	2019	2020	2021
GOM Federal Waters	302,936	219,285	187,433	183,236	181,488	173,336	179,891
GOM State Waters	5,657	665	96	60	71	60	59
Pacific Waters	22,609	17,659	5,052	3,794	3,370	4,262	4,554
Alaska State Waters	21,936	21,191	12,163	9,834	10,711	10,366	10,664
Total Emissions	353,138	258,801	204,745	196,924	195,640	188,024	195,168
Previous Estimate	353,138	258,801	203,917	196,349	195,626	192,943	NA

NA (Not Applicable)

Transportation

Recalculations for the transportation segment have resulted in calculated CH₄ and CO₂ emissions over the time series from this segment that are lower (by less than 0.2 percent) than in the previous Inventory.

Refining

Recalculations due to resubmitted GHGRP data in the refining segment have resulted in average calculated CH₄ emissions over the time series 3 percent lower than in the previous Inventory, and 2020 CH₄ emissions 0.9 lower than in the previous Inventory.

Refining CO_2 emission estimates are on average 0.3 percent lower across the time series than in the previous Inventory and 2 percent lower in 2020 than in the previous Inventory. This change is due to GHGRP resubmissions and was largely due to a change in reported flaring CO_2 emissions.

Table 3-62: Refining National CO₂ Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Flares	3,134	3,557	3,509	3,643	4,961	4,208	4,183
Total Refining	3,284	3,728	3,582	3,706	5,009	4,242	4,216
Previous Estimate	3,284	3,728	3,725	3,820	5,080	4,326	NA

NA (Not Applicable)

Planned Improvements

Planned Improvements for 2024 Inventory

The calculations for Petroleum Systems exploration and production segment emissions do not incorporate updated activity data for the following data inputs, due to a data base subscription lapse: oil well counts, wells drilled, wells completed, and production. Year 2020 values for activity data are used in place of year 2021. Next year's inventory will include the latest data. It is not expected that use of the latest data will result in large recalculations.

Basin-level approaches for pneumatic controllers, equipment leaks, and chemical injection pumps were applied to calculate CH₄ emissions. Feedback EPA received on this update include support for continued use of GHGRP data, and that EPA should consider application of the approach to only basins with 50 percent coverage or more.

For the next Inventory, EPA plans to apply consistent methods for both CO_2 and CH_4 emissions calculations. EPA will also consider including additional emission sources in geographically disaggregated calculations. Additional information on the update and specific requests for stakeholder feedback can be found in the *Disaggregation* memo and *Production Disaggregation* memos.

Upcoming Data, and Additional Data that Could Inform the Inventory

EPA will assess new data received by the Greenhouse Gas Reporting Program, the Methane Challenge Program and other relevant programs on an ongoing basis, which may be used to confirm or improve existing estimates and assumptions.

EPA continues to track studies that contain data that may be used to update the Inventory. EPA will also continue to assess studies that include and compare both top-down and bottom-up estimates, and which could lead to improved understanding of unassigned high emitters (e.g., identification of emission sources and information on frequency of high emitters) as recommended in previous stakeholder comments.

Box 3-6: Carbon Dioxide Transport, Injection, and Geological Storage

Carbon dioxide is produced, captured, transported, and used for Enhanced Oil Recovery (EOR) as well as commercial and non-EOR industrial applications, or is stored geologically. This CO₂ is produced from both naturally-occurring CO₂ reservoirs and from industrial sources such as natural gas processing plants and ammonia plants. In the Inventory, emissions of CO₂ from naturally-occurring CO₂ reservoirs are estimated based on the specific application.

In the Inventory, CO₂ that is used in non-EOR industrial and commercial applications (e.g., food processing, chemical production) is assumed to be emitted to the atmosphere during its industrial use. These emissions are discussed in the Carbon Dioxide Consumption section, 4.15.

For EOR CO₂, as noted in the 2006 IPCC Guidelines, "At the Tier 1 or 2 methodology levels [EOR CO₂ is] indistinguishable from fugitive greenhouse gas emissions by the associated oil and gas activities." In the U.S. estimates for oil and gas fugitive emissions, the Tier 2 emission factors for CO_2 include CO_2 that was originally injected and is emitted along with other gas from leak, venting, and flaring pathways, as measurement data used to develop those factors would not be able to distinguish between CO_2 from EOR and CO_2 occurring in the produced natural gas. Therefore, EOR CO_2 emitted through those pathways is included in CO_2 estimates in 1B2.

IPCC includes methodological guidance to estimate emissions from the capture, transport, injection, and geological storage of CO₂. The methodology is based on the principle that the carbon capture and storage system should be handled in a complete and consistent manner across the entire Energy sector. The approach accounts for CO₂ captured at natural and industrial sites as well as emissions from capture, transport, and use. For storage specifically, a Tier 3 methodology is outlined for estimating and reporting emissions based on site-specific evaluations. However, IPCC (IPCC 2006) notes that if a national regulatory process exists, emissions information available through that process may support development of CO₂ emission estimates for geologic storage.

In the United States, facilities that produce CO₂ for various end-use applications (including capture facilities such as acid gas removal plants and ammonia plants), importers of CO₂, exporters of CO₂, facilities that conduct geologic sequestration of CO₂, and facilities that inject CO₂ underground, are required to report greenhouse gas data annually to EPA through its GHGRP. Facilities reporting geologic sequestration of CO₂ to the GHGRP develop and implement an EPA-approved site-specific monitoring, reporting and verification plan, and report the amount of CO₂ sequestered using a mass balance approach.

GHGRP data relevant for this Inventory estimate consists of national-level annual quantities of CO₂ captured and extracted for EOR applications for 2010 to 2021 and data reported for geologic sequestration from 2016 to 2021

The amount of CO₂ captured and extracted from natural and industrial sites for EOR applications in 2021 is

35,090 kt (35.1 MMT CO_2 Eq.) (see 6). The quantity of CO_2 captured and extracted is noted here for information purposes only; CO_2 captured and extracted from industrial and commercial processes is generally assumed to be emitted and included in emissions totals from those processes.

Table 3-63: Quantity of CO₂ Captured and Extracted for EOR Operations (kt CO₂)

Stage	2017	2018	2019	2020	2021
Quantity of CO ₂ Captured					
and Extracted for EOR					
Operations	49,600	48,400	52,100	35,210	35,090

Several facilities are reporting under GHGRP Subpart RR (Geologic Sequestration of Carbon Dioxide). See Table 3-64 for the number of facilities reporting under Subpart RR, the reported CO₂ sequestered in subsurface geologic formations in each year, and of the quantity of CO₂ emitted from equipment leaks in each year. The quantity of CO₂ sequestered and emitted is noted here for information purposes only; EPA is considering updates to its approach in the Inventory for this source for future Inventories.

Table 3-64: Geologic Sequestration Information Reported Under GHGRP Subpart RR

Stage	2017	2018	2019	2020	2021
Number of Reporting Facilities	3	5	5	6	9
Reported Annual CO ₂					
Sequestered (kt)	5,958	7,662	8,332	6,802	6,947
Reported Annual CO ₂					
Emissions from Equipment					
Leaks (kt)	10	11	16	13	37

3.7 Natural Gas Systems (CRF Source Category 1B2b)

The U.S. natural gas system encompasses hundreds of thousands of wells, hundreds of processing facilities, and over a million miles of transmission and distribution pipelines. This IPCC category (182b) is for fugitive emissions from natural gas systems, which per IPCC guidelines include emissions from leaks, venting, and flaring. Total greenhouse gas emissions (CH₄, CO₂, and N₂O) from natural gas systems in 2021 were 217.5 MMT CO₂ Eq., a decrease of 12 percent from 1990 and a decrease of 2 percent from 2020, both primarily due to decreases in CH₄ emissions. From 2010, emissions decreased by 3 percent, primarily due to decreases in CH₄ emissions. National total dry gas production in the United States increased by 94 percent from 1990 to 2021, increased by 3 percent from 2020 to 2021, and increased by 62 percent from 2010 to 2021. Of the overall greenhouse gas emissions (217.5 MMT CO₂ Eq.), 83 percent are CH₄ emissions (181.4 MMT CO₂ Eq.), 17 percent are CO₂ emissions (36.2 MMT), and less than 0.01 percent are N₂O emissions (0.01 MMT CO₂ Eq.).

Overall, natural gas systems emitted 181.4 MMT CO₂ Eq. (6,478 kt CH₄) of CH₄ in 2021, a 16 percent decrease compared to 1990 emissions, and 2 percent decrease compared to 2020 emissions (see Table 3-66 and Table 3-67). For non-combustion CO₂, a total of 36.2 MMT CO₂ Eq. (36,161 kt) was emitted in 2021, a 12 percent increase compared to 1990 emissions, and a 1 percent increase compared to 2020 levels. The 2021 N₂O emissions were

estimated to be 0.01 MMT CO₂ Eq. (0.03 kt N₂O), a 73 percent increase compared to 1990 emissions, and a 12 percent decrease compared to 2020 levels.

The 1990 to 2021 emissions trend is not consistent across segments or gases. Overall, the 1990 to 2021 decrease in CH₄ emissions is due primarily to the decrease in emissions from the following segments: distribution (70 percent decrease), transmission and storage (30 percent decrease), processing (40 percent decrease), and exploration (94 percent decrease). Over the same time period, the production segment saw increased CH₄ emissions of 45 percent (with onshore production emissions increasing 27 percent, offshore production emissions decreasing 86 percent, and gathering and boosting [G&B] emissions increasing 110 percent), and post-meter emissions increasing by 60 percent. The 1990 to 2021 increase in CO₂ emissions is primarily due to an increase in CO₂ emissions in the production segment, where emissions from flaring have increased over time.

Methane and CO₂ emissions from natural gas systems include those resulting from normal operations, routine maintenance, and system upsets. Emissions from normal operations include natural gas engine and turbine uncombusted exhaust, flaring, and leak emissions from system components. Routine maintenance emissions originate from pipelines, equipment, and wells during repair and maintenance activities. Pressure surge relief systems and accidents can lead to system upset emissions. Emissions of N₂O from flaring activities are included in the Inventory, with most of the emissions occurring in the processing and production segments. Note, CO2 emissions exclude all combustion emissions (e.g., engine combustion) except for flaring CO2 emissions. All combustion CO₂ emissions (except for flaring) are accounted for in Section 3.1 CO₂ from Fossil Fuel Combustion.

Each year, some estimates in the Inventory are recalculated with improved methods and/or data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is representative of changes in emissions. Recalculations in natural gas systems in this year's Inventory include:

- Methodological updates to five onshore production segment sources pneumatic controllers, equipment leaks, chemical injection pumps, storage tanks, and liquids unloading
- Recalculations due to Greenhouse Gas Reporting Program (GHGRP) submission revisions
- Recalculations due to updating the global warming potential (GWP) for CH₄ and N₂O to use AR5 values.

The Recalculations Discussion section below provides more details on the updated methods.

Below is a characterization of the six emission subcategories of natural gas systems: exploration, production (including gathering and boosting), processing, transmission and storage, distribution, and post-meter. Each of the segments is described and the different factors affecting CH₄, CO₂, and N₂O emissions are discussed.

Exploration. Exploration includes well drilling, testing, and completion. Emissions from exploration accounted for less than 0.2 percent of CH₄ emissions and of CO₂ emissions from natural gas systems in 2021. Well completions accounted for approximately 88 percent of CH₄ emissions from the exploration segment in 2021, with the rest resulting from well testing and drilling. Well completion flaring emissions account for most of the CO₂ emissions. Methane emissions from exploration decreased by 94 percent from 1990 to 2021, with the largest decreases coming from hydraulically fractured gas well completions without reduced emissions completions (RECs). Methane emissions decreased 17 percent from 2020 to 2021 due to decreases in emissions from non-hydraulically fractured well completions with venting. Methane emissions were highest from 2005 to 2008. Carbon dioxide emissions from exploration decreased by 94 percent from 1990 to 2021 primarily due to decreases in hydraulically fractured gas well completions. Carbon dioxide emissions from exploration decreased by 83 percent from 2020 to 2021 due to decreases in emissions from hydraulically fractured gas well completions with flaring. Carbon dioxide emissions were highest from 2006 to 2008. Nitrous oxide emissions decreased 98 percent from 1990 to 2021 and decreased 86 percent from 2020 to 2021.

Production (including gathering and boosting). In the production segment, wells are used to withdraw raw gas from underground formations. Emissions arise from the wells themselves, and from well-site equipment and activities such as pneumatic controllers, tanks and separators, and liquids unloading. Gathering and boosting emission sources are included within the production sector. The gathering and boosting sources include gathering and boosting stations (with multiple emission sources on site) and gathering pipelines. The gathering and boosting stations receive natural gas from production sites and transfer it, via gathering pipelines, to transmission pipelines or processing facilities (custody transfer points are typically used to segregate sources between each segment). Boosting processes include compression, dehydration, and transport of gas to a processing facility or pipeline. Emissions from production (including gathering and boosting) accounted for 52 percent of CH₄ emissions and 25 percent of CO₂ emissions from natural gas systems in 2021. Emissions from gathering and boosting and pneumatic controllers in onshore production accounted for most of the production segment CH₄ emissions in 2021. Within gathering and boosting, the largest sources of CH₄ are compressor exhaust slip, compressor venting and leaks, and tanks. Flaring emissions account for most of the CO2 emissions from production, with the highest emissions coming from flare stacks at gathering stations, miscellaneous onshore production flaring, and tank flaring. Methane emissions from production increased by 45 percent from 1990 to 2021, due primarily to increases in emissions from pneumatic controllers (due to an increase in the number of controllers, particularly in the number of intermittent bleed controllers) and increases in emissions from compressor exhaust slip in gathering and boosting. Methane emissions decreased 3 percent from 2020 to 2021 due to decreases in emissions from pneumatic controllers and liquids unloading. Carbon dioxide emissions from production increased by approximately a factor of 2.7 from 1990 to 2021 due to increases in emissions at flare stacks in gathering and boosting and miscellaneous onshore production flaring and increased 3 percent from 2020 to 2021 due primarily to increases in emissions from tanks and acid gas removal units at gathering and boosting stations. Nitrous oxide emissions decreased by 24 percent from 1990 to 2021 and decreased 12 percent from 2020 to 2021. The decrease in N₂O emissions from 1990 to 2021 and from 2020 to 2021 is primarily due to decreases in emissions from flaring at gathering and boosting stations.

Processing. In the processing segment, natural gas liquids and various other constituents from the raw gas are removed, resulting in "pipeline quality" gas, which is injected into the transmission system. Methane emissions from compressors, including compressor seals, are the primary emission source from this stage. Most of the CO₂ emissions come from acid gas removal (AGR) units, which are designed to remove CO₂ from natural gas. Processing plants accounted for 8 percent of CH₄ emissions and 72 percent of CO₂ emissions from natural gas systems. Methane emissions from processing decreased by 40 percent from 1990 to 2021 as emissions from compressors (leaks and venting) and equipment leaks decreased; and increased 3 percent from 2020 to 2021 due to increased emissions from gas engines. Carbon dioxide emissions from processing decreased by 8 percent from 1990 to 2021, due to a decrease in AGR emissions, and increased 3 percent from 2020 to 2021 due to increased emissions from AGR. Nitrous oxide emissions decreased 1 percent from 2020 to 2021.

Transmission and Storage. Natural gas transmission involves high pressure, large diameter pipelines that transport gas long distances from field production and processing areas to distribution systems or large volume customers such as power plants or chemical plants. Compressor station facilities are used to move the gas throughout the U.S. transmission system. Leak CH₄ emissions from these compressor stations and venting from pneumatic controllers account for most of the emissions from this stage. Uncombusted compressor engine exhaust and pipeline venting are also sources of CH₄ emissions from transmission. Natural gas is also injected and stored in underground formations, or liquefied and stored in above ground tanks, during periods of low demand (e.g., summer), and withdrawn, processed, and distributed during periods of high demand (e.g., winter). Leak and venting emissions from compressors are the primary contributors to CH₄ emissions from storage. Emissions from liquefied natural gas (LNG) stations and terminals are also calculated under the transmission and storage segment. Methane emissions from the transmission and storage segment accounted for approximately 25 percent of emissions from natural gas systems, while CO₂ emissions from transmission and storage accounted for 2 percent of the CO₂ emissions from natural gas systems. CH₄ emissions from this source decreased by 30 percent from 1990 to 2021 due to reduced pneumatic device and compressor station emissions (including emissions from compressors and leaks) and decreased 2 percent from 2020 to 2021 due to decreased emissions from pipeline venting transmission compressors. CO₂ emissions from transmission and storage were 4.9 times higher in 2021 than in 1990, due to increased emissions from LNG export terminals, and decreased by 57 percent from 2020 to 2021, also due to LNG export terminals and flaring (both transmission and storage). The quantity of LNG exported from the United States increased by a factor of 68 from 1990 to 2021, and by 49 percent from 2020 to 2021. LNG emissions are about 1 percent of CH₄ and 81 percent of CO₂ emissions from transmission and storage in year 2021. Nitrous oxide emissions from transmission and storage increased by 85 percent from 1990 to 2021 and decreased 56 percent from 2020 to 2021.

Distribution. Distribution pipelines take the high-pressure gas from the transmission system at "city gate" stations, reduce the pressure and distribute the gas through primarily underground mains and service lines to individual end users. There were 1,337,012 miles of distribution mains in 2021, an increase of 392,855 miles since 1990 (PHMSA 2021). Distribution system emissions, which accounted for 8 percent of CH₄ emissions from natural gas systems and less than 1 percent of CO₂ emissions, result mainly from leak emissions from pipelines and stations. An increased use of plastic piping, which has lower emissions than other pipe materials, has reduced both CH₄ and CO₂ emissions from this stage, as have station upgrades at metering and regulating (M&R) stations. Distribution system CH₄ emissions in 2021 were 70 percent lower than 1990 levels and 1 percent lower than 2020 emissions. Distribution system CO₂ emissions in 2021 were 70 percent lower than 1990 levels and 1 percent lower than 2020 emissions. Annual CO₂ emissions from this segment are less than 0.1 MMT CO₂ Eq. across the time series.

Post-Meter. Post-meter includes leak emissions from residential and commercial appliances, industrial facilities and power plants, and natural gas fueled vehicles. Leak emissions from residential appliances and industrial facilities and power plants account for the majority of post-meter CH₄ emissions. Methane emissions from the post-meter segment accounted for approximately 7 percent of emissions from natural gas systems in 2021. Post-meter CH₄ emissions increased by 60 percent from 1990 to 2021 and increased by less than 1 percent from 2020 to 2021, due to increases in the number of residential houses using natural gas and increased natural gas consumption at industrial facilities and power plants. CO₂ emissions from post-meter account for less than 0.01 percent of total CO₂ emissions from natural gas systems.

Total greenhouse gas emissions from the six subcategories within natural gas systems are shown in MMT CO_2 Eq. in Table 3-65. Total CH_4 emissions for these same segments of natural gas systems are shown in MMT CO_2 Eq. (Table 3-66) and kt (Table 3-67). Most emission estimates are calculated using a net emission approach. However, a few sources are still calculated with a potential emission approach. Reductions data are applied to those sources. In 2021, 2.6 MMT CO_2 Eq. CH_4 is subtracted from production segment emissions, 4.3 MMT CO_2 Eq. CH_4 is subtracted from the transmission and storage segment, and 0.1 MMT CO_2 Eq. CH_4 is subtracted from the distribution segment to calculate net emissions. More disaggregated information on potential emissions, net emissions, and reductions data is available in Annex 3.6, Methodology for Estimating CH_4 and CO_2 Emissions from Natural Gas Systems.

Table 3-65: Total Greenhouse Gas Emissions (CH₄, CO₂, and N₂O) from Natural Gas Systems (MMT CO₂ Eq.)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	3.6	11.5	1.8	3.0	2.3	0.3	0.2
Production	68.1	102.4	111.5	116.2	115.5	106.2	103.2
Processing	52.2	31.8	35.8	36.3	40.4	39.3	40.4
Transmission and Storage	64.2	44.4	41.4	43.6	45.6	47.5	45.4
Distribution	51.0	28.5	15.7	15.6	15.5	15.5	15.3
Post-Meter	8.1	9.6	11.9	12.5	12.8	13.0	13.0
Total	247.3	228.3	218.1	227.1	232.2	221.8	217.5

Note: Totals may not sum due to independent rounding.

Table 3-66: CH₄ Emissions from Natural Gas Systems (MMT CO₂ Eq.)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	3.3	10.0	1.4	2.6	2.1	0.2	0.2
Production	64.7	97.9	103.5	107.0	104.7	97.3	94.1
Onshore Production	39.3	69.0	59.9	62.9	59.4	53.8	50.0
Gathering and Boosting	20.7	26.8	42.9	43.3	44.6	42.6	43.4
Offshore Production	4.8	2.0	0.7	0.8	0.7	0.9	0.7
Processing	23.9	13.0	12.9	13.5	14.2	13.9	14.3
Transmission and Storage	64.1	44.2	40.9	43.1	44.3	45.5	44.5

Total	215.1	203.3	186.2	194.3	193.6	185.3	181.4
Post-Meter	8.1	9.6	11.9	12.5	12.8	13.0	13.0
Distribution	50.9	28.5	15.7	15.6	15.5	15.5	15.3

Note: Totals may not sum due to independent rounding.

Table 3-67: CH₄ Emissions from Natural Gas Systems (kt)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	119	358	49	94	75	9	7
Production	2,311	3,495	3,697	3,823	3,739	3,475	3,360
Onshore Production	1,403	2,464	2,139	2,246	2,122	1,923	1,787
Gathering and Boosting	739	958	1,533	1,547	1,591	1,520	1,548
Offshore Production	170	73	26	30	25	32	24
Processing	853	463	460	483	506	495	510
Transmission and Storage	2,288	1,580	1,460	1,538	1,583	1,625	1,590
Distribution	1,819	1,018	561	557	554	553	548
Post-Meter	290	344	424	445	457	463	463
Total	7.680	7.260	6,652	6.939	6.914	6,619	6.478

Note: Totals may not sum due to independent rounding.

Table 3-68: CO₂ Emissions from Natural Gas Systems (MMT)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	0.3	1.4	0.4	0.3	0.2	0.1	+
Production	3.3	4.6	8.0	9.1	10.9	8.9	9.1
Processing	28.3	18.8	22.9	22.8	26.2	25.4	26.1
Transmission and Storage	0.2	0.2	0.5	0.5	1.2	2.1	0.9
Distribution	0.1	+	+	+	+	+	+
Post-Meter	+	+	+	+	+	+	+
Total	32.2	25.0	31.9	32.8	38.6	36.5	36.2

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 3-69: CO₂ Emissions from Natural Gas Systems (kt)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	297	1,434	444	336	220	96	17
Production	3,337	4,556	7,967	9,147	10,857	8,878	9,141
Processing	28,338	18,836	22,935	22,766	26,225	25,419	26,096
Transmission and Storage	180	176	499	547	1,242	2,051	890
Distribution	54	30	17	17	16	16	16
Post-Meter	1	1	2	2	2	2	2
Total	32,207	25,033	31,864	32,815	38,563	36,463	36,161

NE (Not Estimated)

Note: Totals may not sum due to independent rounding.

Table 3-70: N₂O Emissions from Natural Gas Systems (Metric Tons CO₂ Eq.)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	355	1,090	217	156	103	45	6
Production	3,840	5,153	3,730	4,061	4,774	3,310	2,779
Processing	NO	2,977	2,643	2,998	5,081	4,349	4,300
Transmission and Storage	228	274	411	208	560	953	422
Distribution	NO	NO	NO	NO	NO	NO	NO
Post-Meter	NO	NO	NO	NO	NO	NO	NO
Total	4,424	9,495	7,001	7,424	10,518	8,658	7,649

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

Table 3-71: N₂O Emissions from Natural Gas Systems (Metric Tons N₂O)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	1.3	4.1	0.8	0.6	0.4	0.2	0.0
Production	14.5	19.4	14.1	15.3	18.0	12.5	10.5
Processing	NO	11.2	10.0	11.3	19.2	16.4	16.2
Transmission and Storage	0.9	1.0	1.6	0.8	2.1	3.6	1.6
Distribution	NO						
Post-Meter	NO						
Total	16.7	35.8	26.4	28.0	39.7	32.7	28.9

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

See Annex 3.6 for the full time series of emissions data, activity data, and emission factors, and additional information on methods and data sources—for example, the specific years of reporting data from EPA's GHGRP that are used to develop certain factors.

This section provides a general overview of the methodology for natural gas system emission estimates in the Inventory, which involves the calculation of CH₄, CO₂, and N₂O emissions for over 100 emissions sources (i.e., equipment types or processes), and then the summation of emissions for each natural gas segment.

The approach for calculating emissions for natural gas systems generally involves the application of emission factors to activity data. For most sources, the approach uses technology-specific emission factors or emission factors that vary over time and take into account changes to technologies and practices, which are used to calculate net emissions directly. For others, the approach uses what are considered "potential methane factors" and emission reduction data to calculate net emissions. The estimates are developed with an IPCC Tier 2 approach. Tier 1 approaches are not used.

Emission Factors. Key references for emission factors for CH_4 and CO_2 emissions from the U.S. natural gas industry include a 1996 study published by the Gas Research Institute (GRI) and EPA (GRI/EPA 1996), EPA's GHGRP (EPA 2022), and others.

The 1996 GRI/EPA study developed over 80 CH₄ emission factors to characterize emissions from the various components within the operating segments of the U.S. natural gas system. The GRI/EPA study was based on a combination of process engineering studies, collection of activity data, and measurements at representative natural gas facilities conducted in the early 1990s. Year-specific natural gas CH₄ compositions are calculated using U.S. Department of Energy's Energy Information Administration (EIA) annual gross production data for National Energy Modeling System (NEMS) oil and gas supply module regions in conjunction with data from the Gas Technology Institute (GTI, formerly GRI) Unconventional Natural Gas and Gas Composition Databases (GTI 2001). These year-specific CH₄ compositions are applied to emission factors, which therefore may vary from year to year due to slight changes in the CH₄ composition of natural gas for each NEMS region.

GHGRP Subpart W data were used to develop CH₄, CO₂, and N₂O emission factors for many sources in the Inventory. In the exploration and production segments, GHGRP data were used to develop emission factors used for all years of the time series for well testing, gas well completions and workovers with and without hydraulic fracturing, pneumatic controllers and chemical injection pumps, condensate tanks, liquids unloading, miscellaneous flaring, gathering and boosting pipelines, and certain sources at gathering and boosting stations. In the processing segment, for recent years of the times series, GHGRP data were used to develop emission factors for leaks, compressors, flares, dehydrators, and blowdowns/venting. In the transmission and storage segment, GHGRP data were used to develop factors for all years of the time series for LNG stations and terminals and transmission pipeline blowdowns, and for pneumatic controllers for recent years of the times series.

Other data sources used for CH₄ emission factors include Zimmerle et al. (2015) for transmission and storage station leaks and compressors, GTI (2009 and 2019) for commercial and industrial meters, Lamb et al. (2015) for recent years for distribution pipelines and meter/regulator stations, Zimmerle et al. (2019) for gathering and boosting stations, Bureau of Ocean Energy Management (BOEM) reports, and Fischer et al. (2019) and IPCC (2019) for post-meter emissions.

For CO_2 emissions from sources in the exploration, production and processing segments that use emission factors not directly calculated from GHGRP data, data from the 1996 GRI/EPA study and a 2001 GTI publication were used to adapt the CH_4 emission factors into related CO_2 emission factors. For sources in the transmission and storage segment that use emission factors not directly calculated from GHGRP data, and for sources in the distribution segment, data from the 1996 GRI/EPA study and a 1993 GTI publication were used to adapt the CH_4 emission factors into non-combustion related CO_2 emission factors. CO_2 emissions from post-meter sources (commercial, industrial and vehicles) were estimated using default emission factors from IPCC (2019). Carbon dioxide emissions from post-meter residential sources are included in fossil fuel combustion data.

Flaring N₂O emissions were estimated for flaring sources using GHGRP data.

See Annex 3.6 for more detailed information on the methodology and data used to calculate CH₄, CO₂, and N₂O emissions from natural gas systems.

Activity Data. Activity data were taken from various published data sets, as detailed in Annex 3.6. Key activity data sources include data sets developed and maintained by EPA's GHGRP (EPA 2022); Enverus (Enverus 2021); BOEM; Federal Energy Regulatory Commission (FERC); EIA; the Natural Gas STAR and Methane Challenge Programs annual data; Oil and Gas Journal; and PHMSA. Enverus data for 2021 were not available; this version of the Inventory uses 2020 data as proxy for 2021.

For a few sources, recent direct activity data are not available. For these sources, either 2020 data were used as a proxy for 2021 data, or a set of industry activity data drivers was developed and used to calculate activity data over the time series. Drivers include statistics on gas production, number of wells, system throughput, miles of various kinds of pipe, and other statistics that characterize the changes in the U.S. natural gas system infrastructure and operations. More information on activity data and drivers is available in Annex 3.6.

A complete list of references for emission factors and activity data by emission source is provided in Annex 3.6.

Calculating Net Emissions. For most sources, net emissions are calculated directly by applying emission factors to activity data. Emission factors used in net emission approaches reflect technology-specific information, and take into account regulatory and voluntary reductions. However, for production, transmission and storage, and distribution, some sources are calculated using potential emission factors, and CH4 that is not emitted is deducted from the total CH4 potential estimates. To take into account use of such technologies and practices that result in lower emissions but are not reflected in "potential" emission factors, data are collected on both regulatory and voluntary reductions. Regulatory actions addressed using this method include EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations for dehydrator vents. Voluntary reductions included in the Inventory are those reported to Natural Gas STAR and Methane Challenge for certain sources. Natural Gas STAR and Methane Challenge reductions were reassessed for this Inventory, see the Recalculations Discussion for more information.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2020. GHGRP data available (starting in 2011) and other recent data sources have improved estimates of emissions from natural gas systems. To develop a consistent time series, for sources with new data, EPA reviewed available information on factors that may have resulted in changes over the time series (e.g., regulations, voluntary actions) and requested stakeholder feedback on trends as well. For most sources, EPA developed annual data for 1993 through 2010 by interpolating activity data or emission factors or both between 1992 and 2011 data points. Information on time-series consistency for sources updated in this year's Inventory can be found in the Recalculations Discussion below, with additional detail provided in supporting memos (relevant memos are cited in the Recalculations Discussion). For detailed documentation of methodologies, please see Annex 3.5.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 269 of 1050 PageID 3717

Through EPA's stakeholder process on oil and gas in the Inventory, EPA received stakeholder feedback on updates under consideration for the Inventory. Stakeholder feedback is noted below in Recalculations Discussion and Planned Improvements.

The United States reports data to the UNFCCC using this Inventory report along with Common Reporting Format (CRF) tables. This note is provided for those reviewing the CRF tables: The notation key "IE" is used for CO₂ and CH₄ emissions from venting and flaring in CRF table 1.B.2. Disaggregating flaring and venting estimates across the Inventory would involve the application of assumptions and could result in inconsistent reporting and, potentially, decreased transparency. Data availability varies across segments within oil and gas activities systems, and emission factor data available for activities that include flaring can include emissions from multiple sources (flaring, venting and leaks).

Uncertainty

EPA has conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo Simulation technique) to characterize the uncertainty for natural gas systems. For more information on the approach, please see the memoranda *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Natural Gas and Petroleum Systems Uncertainty Estimates* and *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Update for Natural Gas and Petroleum Systems CO₂ Uncertainty Estimates.*⁷⁹

EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around CH4 and CO2 emissions from natural gas systems for the current Inventory. For the CH₄ uncertainty analysis, EPA focused on the 17 highest-emitting sources for the year 2021, which together emitted 75 percent of methane from natural gas systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. For the CO2 uncertainty analysis, EPA focused on the three highest-emitting sources for the year 2021, which together emitted 79 percent of CO₂ from natural gas systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. To estimate uncertainty for N₂O, EPA applied the uncertainty bounds calculated for CO₂. EPA will seek to refine this estimate in future Inventories. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification. The understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve.

The results presented below provide the 95 percent confidence bound within which actual emissions from this source category are likely to fall for the year 2021, using the IPCC methodology. The results of the Approach 2 uncertainty analysis are summarized in Table 3-72. Natural gas systems CH₄ emissions in 2021 were estimated to be between 151.1 and 211.7 MMT CO₂ Eq. at a 95 percent confidence level. Natural gas systems CO₂ emissions in 2021 were estimated to be between 30.7 and 40.7 MMT CO₂ Eq. at a 95 percent confidence level. Natural gas systems N₂O emissions in 2021 were estimated to be between 0.0067 and 0.0088 MMT CO₂ Eq. at a 95 percent confidence level. The basin-specific updates to activity factors and emissions factors discussed elsewhere impacted the uncertainty results when compared to the uncertainty analysis in the previous Inventory. The second highest emitting methane source in 2021, pneumatic controllers, included an updated approach to estimate emissions that analyzed basin-level data. EPA modeled uncertainty at the basin level as well for this source. The increased granularity in modelling led to an overall decrease in the uncertainty bounds.

Uncertainty bounds for other years of the time series have not been calculated, but uncertainty is expected to vary over the time series. For example, years where many emission sources are calculated with interpolated data would

79 See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

Energy 3-99

likely have higher uncertainty than years with predominantly year-specific data. In addition, the emission sources that contribute the most to CH₄ and CO₂ emissions are different over the time series, particularly when comparing recent years to early years in the time series. For example, venting emissions were higher and flaring emissions were lower in early years of the time series, compared to recent years. Technologies also changed over the time series (e.g., liquids unloading with plunger lifts and reduced emissions completions were not used early in the time series and cast iron distribution mains were more prevalent than plastic mains in early years). Transmission and gas processing compressor leak and vent emissions were also higher in the early years of the time series.

Table 3-72: Approach 2 Quantitative Uncertainty Estimates for CH₄ and Non-combustion CO₂ **Emissions from Natural Gas Systems (MMT CO₂ Eq. and Percent)**

Cource	2021 Emission Estima Gas		Uncertaint	y Range Relativ	e to Emission	Estimatea
Source	Gas	(MMT CO ₂ Eq.) ^b	(MMT C	O ₂ Eq.)	(%)	
			Lower	Upper	Lower	Upper
			Bound ^b	Bound ^b	Bound ^b	Boundb
Natural Gas Systems	CH ₄	181.4	151.1	211.7	-17%	+17%
Natural Gas Systems	CO_2	36.2	30.7	40.7	-13%	+15%
Natural Gas Systems	N_2O	+	+	+	-13%	+15%

⁺ Less than 0.05 MMT CO₂ Eq.

QA/QC and Verification Discussion

The natural gas systems emission estimates in the Inventory are continually being reviewed and assessed to determine whether emission factors and activity factors accurately reflect current industry practices. A QA/QC analysis was performed for data gathering and input, documentation, and calculation. QA/QC checks are consistently conducted to minimize human error in the model calculations. EPA performs a thorough review of information associated with new studies, GHGRP data, regulations, public webcasts, and the Natural Gas STAR Program to assess whether the assumptions in the Inventory are consistent with current industry practices. The EPA has a multi-step data verification process for GHGRP data, including automatic checks during data-entry, statistical analyses on completed reports, and staff review of the reported data. Based on the results of the verification process, the EPA follows up with facilities to resolve mistakes that may have occurred. 80

As in previous years, EPA conducted early engagement and communication with stakeholders on updates prior to public review of the current Inventory. EPA held stakeholder webinars in September and November of 2022. EPA released memos detailing updates under consideration and requesting stakeholder feedback.

In recent years, several studies have measured emissions at the source level and at the national or regional level and calculated emission estimates that may differ from the Inventory. There are a variety of potential uses of data from new studies, including replacing a previous estimate or factor, verifying or QA of an existing estimate or factor, and identifying areas for updates. In general, there are two major types of studies related to oil and gas greenhouse gas data: studies that focus on measurement or quantification of emissions from specific activities, processes and equipment, and studies that use tools such as inverse modeling to estimate the level of overall emissions needed to account for measured atmospheric concentrations of greenhouse gases at various scales. The first type of study can lead to direct improvements to or verification of Inventory estimates. In the past few years, EPA has reviewed and, in many cases, incorporated data from these data sources. The second type of study can

^a Range of emission estimates estimated by applying the 95 percent confidence intervals obtained from the Monte Carlo Simulation analysis conducted for the year 2021 CH₄ and CO₂ emissions.

^b All reported values are rounded after calculation. As a result, lower and upper bounds may not be duplicable from other rounded values as shown in Table 3-66 and Table 3-67.

⁸⁰ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

provide general indications of potential over- and under-estimates. In addition, in recent years information from top-down studies has been directly incorporated to quantify emissions from well blowouts.

A key challenge in using these types of studies to assess Inventory results is having a relevant basis for comparison (e.g., the two data sets should have comparable time frames and geographic coverage, and the independent study should assess data from the Inventory and not another data set, such as the Emissions Database for Global Atmospheric Research, or "EDGAR"). In an effort to improve the ability to compare the national-level Inventory with measurement results that may be at other spatial or temporal scales, a team at Harvard University along with EPA and other coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1 degree x 0.1 degree spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization. ⁸¹ The gridded methane inventory is designed to be consistent with the U.S. EPA's *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014* estimates for the year 2012, which presents national totals. ⁸² An updated version of the gridded inventory is being developed and will improve efforts to compare results of the Inventory with atmospheric studies.

Recalculations Discussion

EPA received information and data related to the emission estimates through GHGRP reporting and stakeholder feedback on updates under consideration. In October 2022 and February 2023, EPA released draft memoranda that discussed changes under consideration and requested stakeholder feedback on those changes. ⁸³ Feedback received is discussed in the Planned Improvements section below. Memoranda cited in the Recalculations Discussion below are: Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data (*Disaggregation* memo) and Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data for the Production Segment (*Production Disaggregation* memo).

In this Inventory, an update that incorporates additional basin-level data from GHGRP subpart W was implemented for several emission sources in the onshore production segment. The update seeks to improve the ability of EPA's gridded and state inventories to reflect variation due to differences in formation types, technologies and practices, regulations, or voluntary initiatives, and not only the differences in key activity levels that are reflected in the current gridded and state inventories. This would allow EPA to use the gridded inventory for improved comparisons of the national Inventory with various atmospheric observation studies (since regions will better reflect the local differences in emissions rates as reported to GHGRP) and would allow the state-level inventory to reflect differences in state-level programs, formation type mixes, and varying technologies and practices. For many sources, an approach that develops estimates using geographically disaggregated data may not be possible or preferable to a national level approach based on the currently available data. For some emission sources in the Inventory, emission factor data come from research studies and are applied at the national level. For example, many of the emission factors used to quantify emissions in the Inventory for the gathering and boosting, transmission and storage, distribution, and post-meter segments are from research studies and do not have a level of detail or total population comparable to GHGRP. Even in cases where geographically disaggregated data are available, such an approach may not always be preferable. In cases with limited variation between areas, such an approach would have limited impact on emissions estimates regionally or nationally. In cases with limited data in certain areas, disaggregated approaches might substantially increase the uncertainty of estimates and basinspecific calculations would not be an improvement over use of a national average. EPA continues to seek stakeholder feedback on the draft approach in this Inventory.

Energy 3-101

⁸¹ See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

⁸² See https://www.epa.gov/ghgemissions/us-greenhouse-gas-inventory-report-1990-2014.

⁸³ Stakeholder materials including draft memoranda for the current (i.e., 1990 to 2021) Inventory are available at https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

EPA evaluated relevant information available and made several updates to the Inventory, including for pneumatic controllers, equipment leaks, chemical injection pumps, storage tanks, and liquids unloading. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. General information for these source specific recalculations are presented below and details are available in the *Disaggregation* memo and *Production Disaggregation* memo, including additional considerations for the updates.

In addition to the production segment sources mentioned above, for certain sources, CH_4 and/or CO_2 emissions changed by greater than 0.05 MMT CO_2 Eq., comparing the previous estimate for 2020 to the current (recalculated) estimate for 2020. The emissions changes were mostly due to GHGRP data submission revisions. These sources are discussed below and include miscellaneous production flaring, offshore production, distribution pipelines, and post-meter emissions.

In addition, for the current Inventory, CO₂-equivalent emissions totals have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ has increased from 25 to 28, leading to an increase in the calculated CO₂-equivalent emissions of CH₄, while the GWP of N₂O has decreased from 298 to 265, leading to a decrease in the calculated CO₂-equivalent emissions of N₂O. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

The combined impact of revisions to 2020 natural gas systems CH_4 emissions, compared to the previous Inventory, is an increase from 164.9 to 185.3 MMT CO_2 Eq. (20.4 MMT CO_2 Eq., or 12 percent), or an increase from 6,596 kt CH_4 to 6,619 kt CH_4 , or less than 1 percent. The recalculations resulted in an average increase in the annual CH_4 emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 24.0 MMT CO_2 Eq., or 13.5 percent, or 89 kt CH_4 , or 1 percent.

The combined impact of revisions to 2020 natural gas systems CO_2 emissions, compared to the previous Inventory, is an increase from 35.4 MMT to 36.5 MMT, or 3.1 percent. The recalculations resulted in an average increase in emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 0.2 MMT CO_2 Eq., or 0.7 percent.

The combined impact of revisions to 2020 natural gas systems N_2O emissions, compared to the previous Inventory, is a decrease from 10.2 kt CO_2 Eq. to 8.7 kt CO_2 Eq., or 15 percent, (or a decrease of 4 percent comparing on a basis of kt N_2O). The recalculations resulted in an average decrease in emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 11 percent (or a decrease of less than 1 percent comparing on a basis of kt N_2O).

In Table 3-73 and Table 3-74 below are categories in Natural Gas Systems with recalculations resulting in a change of greater than 0.05 MMT CO_2 Eq., comparing the previous estimate for 2019 to the current (recalculated) estimate for 2019. No changes made to N_2O estimates resulted in a change greater than 0.05 MMT CO_2 Eq. For more information, please see the Recalculations Discussion below.

For certain sources, the change in GWP for CH₄ alone (i.e., not the results of other recalculations) resulted in calculated CH₄ CO₂-equivalent emissions for 2020 changing by greater than 0.05 MMT CO₂ Eq., compared to the previous Inventory. These sources are not discussed below. The production segment sources impacted by the GWP update are: wellhead leaks, produced water, dehydrator kimray pumps, gas engine exhaust, G&B compressors, G&B pneumatic controllers, G&B pneumatic pumps, G&B combustion slip, G&B yard piping, and G&B pipeline leaks. The natural gas processing sources impacted by the GWP update are: reciprocating compressors, gas engine exhaust, and blowdowns. The transmission and storage sources impacted by the GWP update are: compressor station leaks, reciprocating compressors, centrifugal compressors, M&R, gas engine exhaust, pneumatic controllers, pipeline venting, and compressor station venting. The distribution sources impacted by the GWP update are distribution main and service leaks, customer meters, and mishaps.

Table 3-73: Recalculations of CO₂ in Natural Gas Systems (MMT CO₂)

Segment and Emission Sources with Changes of Greater than 0.05 MMT CO ₂ due to Recalculations	Previous Estimate Year 2020, 2022 Inventory	Current Estimate Year 2020, 2023 Inventory	Current Estimate Year 2021, 2023 Inventory
Exploration	0.1	0.1	+
Production	7.7	8.9	9.1
Misc. Onshore Production Flaring	1.1	1.3	1.0
Large Tanks with Flares	0.6	0.9	0.9
Liquids Unloading	+	+	+
G&B Station Sources	5.8	6.5	7.1
Processing	25.5	25.4	26.1
Flares	7.9	8.1	7.4
Transmission and Storage	2.0	2.1	0.9
Distribution	+	+	+
Post-Meter	+	+	+
Total	35.4	36.5	36.2

⁺ Does not exceed 0.05 MMT CO₂.

Table 3-74: Recalculations of CH₄ in Natural Gas Systems (MMT CO₂ Eq.)

Segment and Emission Sources with Changes of Greater than 0.05 MMT CO ₂ due to Recalculations	Previous Estimate Year 2020, 2022 Inventory	Current Estimate Year 2020, 2023 Inventory	Current Estimate Year 2021, 2023 Inventory
Exploration	0.2	0.2	0.2
Production	86.4	97.3	94.1
Well pad Equipment Leaks	6.6	10.3	9.6
Chemical Injection Pumps	2.8	2.4	2.1
Pneumatic Controllers	23.8	22.8	21.3
Tanks	0.4	1.5	1.2
Liquids Unloading	3.2	4.5	3.4
G&B Station Sources	34.1	38.7	39.8
Processing	12.4	13.9	14.3
Transmission and Storage	40.6	45.5	44.5
Distribution	13.9	15.5	15.3
Pipeline Mains – Unprotected Steel	1.0	1.1	1.0
Post-Meter	11.5	13.0	13.0
Total	164.9	185.3	181.4

Exploration

There were no methodological updates to the exploration segment, and recalculations due to updated data resulted in average decreases in calculated CH₄ and CO₂ emissions over the time series of less than 1 percent.

Production

Pneumatic Controllers (Methodological Update)

EPA updated the calculation methodology for pneumatic controllers to use basin-specific activity factors and emission factors calculated from subpart W data for each type of controller (i.e., high, intermittent, and low bleed). Previously, national average activity and emission factors calculated using subpart W data were applied to estimate pneumatic controller emissions. In this methodological update, EPA summed basin-level emissions

together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH₄ emission factors were calculated for all basins that reported subpart W data. The factors were year-specific for RY2011 through RY2021. EPA retained the previous Inventory's activity factor assumptions for 1990 through 1992 and applied linear interpolation between the 1992 and 2011 activity factors at the basin-level. Year 2011 emission factors were applied to all prior years for each basin. For basins without subpart W data available, EPA applied national average activity and emission factors.

The estimation methodology for CO₂ emissions was not updated to use the basin-specific approach for this version of the Inventory. CO₂ emissions were estimated by applying a CO₂ to CH₄ ratio to the estimated CH₄ emissions. EPA will calculate pneumatic controller CO₂ emissions in the same manner as CH₄ emissions for the next version of this Inventory (i.e., 2024 Inventory).

As a result of this methodological update, CH₄ emissions estimates are on average 4 percent higher across the time-series than in the previous Inventory. The estimate for 2020 is 14 percent lower than in the previous Inventory. Pneumatic controller CH₄ emissions were higher for all years between 1990 through 2011 by an average of 8 percent and CH₄ emissions were lower for 2011 through 2020 by an average of 6 percent, compared to the previous inventory. Emissions were lower in recent years due to some basins having slightly lower activity factors and/or emission factors for intermittent bleed pneumatic controllers, compared to the national average. Emissions were higher in early years of the time series due to basins having higher emission factors than the national average. Multiple basins impact the emissions changes for pneumatic controllers at gas wells.

Table 3-75: Pneumatic Controllers National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Low Bleed Controllers	0	22,745	32,360	33,805	31,475	27,364	25,609
High Bleed Controllers	350,535	483,375	108,533	87,071	53,233	42,332	42,828
Intermittent Bleed Controllers	230,504	569,592	873,015	835,249	874,372	744,622	692,097
Total Emissions	581,039	1,075,712	1,013,908	956,125	959,080	814,318	760,534
Previous Estimate	510,354	1,041,503	1,104,896	1,072,874	1,024,678	950,718	NA

NA (Not Applicable)

Storage Tanks (Methodological Update)

EPA updated the calculation methodology for production segment storage tanks to use basin-specific activity factors and emission factors calculated from Subpart W data for each storage tank category. Previously, national annual average activity and emission factors calculated using Subpart W data were applied to estimate storage tank emissions. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The calculation methodology was updated to estimate CH₄ and CO₂ emissions using basin-level data from subpart W. The *Production Disaggregation* memo presents additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH_4 and CO_2 emission factors for all basins that reported subpart W data. The factors were year-specific for reporting year (RY) 2015 through RY2021. EPA also retained the previous Inventory's activity factor assumptions for 1990 and used linear interpolation between the 1990 and 2015 activity factors at the basin-level. Year 2015 emission factors were applied to all prior years for each basin. For basins without Subpart W data available, EPA applied national average activity and emission factors.

This update resulted in CH_4 emission estimates an average of 276 percent higher across the time series compared with the previous Inventory. The estimate for 2020 is 210 percent higher than in the previous Inventory. Storage tank CO_2 emissions are an average of 43 percent higher across the time series compared to the previous Inventory. The 2020 emission estimate is 50 percent higher than in the previous Inventory.

The basin-level approach's emissions increased because certain basins with high liquids production and storage tank throughput had higher emission factors and/or activity factors than the national average. The time-series is also impacted as the basin-level approach reflects changing levels of liquids production, and hence storage tank

throughput, for basins across the time-series; basins with more production and storage tank throughput in the early 90s also corresponded to basins with higher emission factors and/or activity factors than the national average. For CH₄, this is particularly noticeable for basins with small tanks without flares (e.g., Arkoma Basin, Bend Arch, Central Western Overthrust, East Texas, Piceance) and for CO₂ emissions this is noticeable for basins using large tanks with flares (e.g., Anadarko Basin, Appalachian, Chautauqua Platform, Denver, Gulf Coast, Permian, South Oklahoma Folded Belt).

Table 3-76: Storage Tanks National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	505	336	1,016	1,273	789	600	606
Large Tanks w/VRU	0	27	205	143	905	525	371
Large Tanks w/o Control	16,161	6,867	6,622	15,416	2,446	4,284	4,916
Small Tanks w/Flares	0	51	249	237	208	201	168
Small Tanks w/o Flares	89,757	31,176	40,152	43,448	63,168	47,749	37,959
Malfunctioning Separator Dump							
Valves	7	4	648	40	80	254	197
Total Emissions	106,429	38,461	48,892	60,556	67,595	53,613	44,217
Previous Estimate	16,421	11,331	21,493	24,435	21,194	17,294	NA

NA (Not Applicable)

Table 3-77: Storage Tanks National CO₂ Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	579	422	1,804	1,356	840	795	825
Large Tanks w/VRU	0	2	0	0	1	1	1
Large Tanks w/o Control	2	1	1	37	1	1	1
Small Tanks w/Flares	0	13	72	87	82	41	28
Small Tanks w/o Flares	47	18	23	26	33	24	18
Malfunctioning Separator Dump							
Valves	0	0	2	0	0	1	0
Total Emissions	628	456	1,902	1,507	956	862	873
Previous Estimate	298	380	1,131	844	634	574	NA

NA (Not Applicable)

Equipment Leaks (Methodological Update)

EPA updated the calculation methodology for onshore production equipment leaks to use basin-specific equipment-level activity factors (e.g., separators per well) from GHGRP data. Previously, national average equipment activity factors developed using RY2014 GHGRP data were used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific equipment-level activity factors for all basins that reported Subpart W data. The factors were year-specific for RY2015 through RY2021. EPA also retained the previous Inventory's activity factors for 1990 through 1992 and used linear interpolation between the 1992 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied national average activity factors. This methodological update applies only for activity factors. The previous Inventory's CH₄ emission factors for onshore production segment equipment leaks (by equipment type) were retained and used to develop CH₄ estimates. Since the CH₄ emission factors were not updated, EPA also retained the Gas STAR reductions that are applicable to equipment leaks.

The calculation methodology for CO₂ emissions was not updated for this version of the Inventory. The previous Inventory's methodology was retained to develop CO₂ estimates. EPA will calculate equipment leak CO₂ emissions in the same manner as CH₄ emissions for the next versions of this Inventory (i.e., 2024 Inventory).

This update resulted in CH₄ emission estimates an average of 8 percent higher across the time series compared to the previous Inventory. The 2020 emission estimate is 39 percent higher than in the previous Inventory. The early years of the time series are minimally impacted by the update, with average CH₄ emissions 1 percent lower for years 1990 through 2002, compared to the previous Inventory. Methane emissions are an average of 14 percent higher for 2002 through 2020, compared to the previous Inventory. These recent years of the time series relied on the basin-specific activity factors and certain basins had higher activity factors compared to the national average factors (e.g., Anadarko Basin, Arkla, Fort Worth Syncline, Gulf Coast, Powder River, San Juan, Strawn).

Table 3-78: Production Equipment Leaks National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Heaters	12,116	20,307	20,068	80,312	16,421	19,223	17,694
Separators	40,746	92,060	129,978	124,339	128,675	132,409	112,425
Dehydrators	12,722	12,796	4,485	5,552	3,739	3,133	4,128
Meters/Piping	42,205	72,148	78,403	81,139	85,625	154,544	135,476
Compressors	29,858	64,877	73,000	72,026	64,471	60,157	73,963
Gas STAR Reductions for Leaks	26	22,908	2,748	71	133	133	133
Total Emissions	137,647	239,280	303,187	363,296	298,797	369,333	343,553
Previous Estimate	138,844	220,489	273,028	274,664	270,662	265,657	NA

NA (Not Applicable)

Chemical Injection Pumps (Methodological Update)

EPA updated the calculation methodology for chemical injection pumps to use basin-specific activity factors from GHGRP data. Previously, national average activity factors developed using RY2014 GHGRP data were used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors for all basins that reported subpart W data. The factors were year-specific for RY2015 through RY2021. EPA also retained the previous Inventory's activity factors for 1990 through 1992 and applied linear interpolation between the 1992 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied national average activity factors. This methodological update applies only to activity factors. The previous Inventory's CH₄ emission factor for chemical injection pumps was retained and used to develop CH₄ estimates.

The estimation methodology for CO₂ emissions was not updated for this version of the Inventory. The previous Inventory's methodology was retained to develop CO₂ estimates. EPA will calculate chemical injection pump CO₂ emissions in the same manner as CH₄ emissions for the next version of this Inventory (i.e., 2024 Inventory).

This update resulted in CH₄ emission estimates an average of 86 percent higher across the time-series. The 2020 emission estimate is 24 percent lower than in the previous Inventory. The emissions increase across the time-series is predominantly due to the Bend Arch, which has a very high RY2015 activity factor (chemical injection pumps per well), which then impacts prior years because it's used in the linear interpolation back to the 1992 activity factor.

Table 3-79: Chemical Injection Pumps National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Chemical Injection Pumps	25,345	183,832	113,726	120,984	108,546	84,002	76,315
Previous Estimate	27,158	84,573	116,107	115,140	113,538	110,785	NA

NA (Not Applicable)

Liquids Unloading (Methodological Update)

EPA updated the calculation methodology for liquids unloading to use basin-specific activity factors and emission factors calculated from subpart W data for each type of liquids unloading (i.e., with and without plunger lifts). Previously, national average activity and emission factors calculated using Subpart W data were applied to estimate liquids unloading emissions. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors, and CH₄ and CO₂ emission factors for all basins that reported subpart W data. The factors were also year-specific for RY2011 through RY2021. EPA also revised the previous Inventory's activity factor and emission factor assumptions for 1990 through 1992. Previously, Year 2011 emission factors were applied to all prior years of the time series and activity factors were derived by linear interpolation between Year 2011 data and API/ANGA data (collected in 2011) for 1990. In the current Inventory, EPA used activity and emission factors developed using GRI data for 1990 through 1992 (GRI/EPA 1996). The 1996 GRI study did not include CO₂ data for liquids unloading. EPA used RY2011 CO₂ emission factors for the earlier years in the time series (i.e., 1990 through 2010). The same activity and emission factors derived from the GRI data were used for all basins for 1990 through 1992. For the remaining time series years (i.e., 1993-2010), EPA applied linear interpolation between the 1992 and 2011 factors at the basin-level. For basins without subpart W data available, EPA applied national average activity and emission factors.

This update resulted in CH_4 and CO_2 emission estimates an average of 15 percent lower across the time series than in the previous Inventory. In the earlier years of the time series (i.e., 1990 through 2006), CH_4 emissions are lower than in the previous Inventory by an average of 43 percent. CO_2 emissions over the same time period are lower than in the previous Inventory by an average of 38 percent. For the time series years with reported GHGRP data (i.e., 2011 through 2020), CH_4 emissions increased by an average of 21 percent, compared to the previous Inventory. Similarly, CO_2 emissions also increased by an average of 17 percent during 2011 through 2020. The basin-level approach's emissions were higher than the previous Inventory's because certain basins with high gas well counts (e.g., Appalachian and Anadarko basins) had higher emission factors than the national average.

Table 3-80: Liquids Unloading National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Liquids Unloading With Plunger							
Lifts	0	144,856	68,633	99,159	85,536	60,280	39,456
Liquids Unloading Without Plunger							
Lifts	76,815	214,070	116,012	166,014	124,428	98,687	80,690
Total Emissions	76,815	358,925	184,645	265,173	209,964	158,968	120,145
Previous Estimate	373,528	379,184	155,178	207,603	175,156	129,831	NA
NA (Not Applicable)							

Table 3-81: Liquids Unloading National CO₂ Emissions (Metric Tons CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Liquids Unloading With Plunger							
Lifts	0	11,926	3,376	4,212	2,864	2,606	1,967
Liquids Unloading Without Plunger							
Lifts	44,810	40,806	5,390	7,227	7,270	3,562	3,733
Total Emissions	44,810	52,733	8,767	11,439	10,134	6,168	5,700
Previous Estimate	83,155	67,087	7,487	9,181	8,284	5,491	NA

NA (Not Applicable)

Miscellaneous Production Flaring (Recalculation with Updated Data)

Miscellaneous production flaring CO₂ emissions estimates are on average 0.2 percent higher across the 1990 to 2020 time series compared with the previous Inventory and the 2020 estimate is 23 percent higher, compared to the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-82: Miscellaneous Production Flaring National Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Miscellaneous Flaring-Gulf							
Coast Basin	NO	166	209	137	398	250	267
Miscellaneous Flaring-							
Williston Basin	NO	+	10	6	3	4	4
Miscellaneous Flaring-Permian							
Basin	NO	260	622	707	889	831	483
Miscellaneous Flaring-Other							
Basins	NO	117	306	476	305	213	236
Total Emissions	NO	543	1,148	1,326	1,595	1,298	991
Previous Estimate	NO	543	1,145	1,344	1,904	1,060	NA

⁺ Does not exceed 0.5 kt.

Gathering and Boosting – Tanks (Recalculation with Updated Data)

Methane emission estimates for gathering and boosting tanks are on average 0.1 percent lower across the 1990 to 2020 time series than in the previous Inventory. The 2020 estimate is 2 percent lower than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-83: Tanks National Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Tanks	129,829	165,236	255,244	249,489	295,914	239,623	276,748
Previous Estimate	129,829	165,236	255,244	249,489	300,169	244,257	NA

NA (Not Applicable)

Gathering and Boosting – Station Blowdowns

Methane emissions estimates for gathering and boosting station blowdowns are on average 0.7 percent lower across the 1990 to 2020 time series than in the previous Inventory. The 2020 estimate is 10 percent lower than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-84: Station Blowdowns National Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Station Blowdowns	20,517	26,113	63,852	78,548	38,412	40,468	42,231
Previous Estimate	20,517	26,113	63,852	78,548	43,865	44,881	NA

NA (Not Applicable)

Gathering and Boosting – Dehydrator Vents (Large Units)

Methane emissions for dehydrator vents at large units are on average of 4 percent higher across the 1990 to 2020 time series compared with the previous Inventory. The 2020 estimate is 115 percent higher compared to the previous Inventory. The dehydrator vents at large units CO₂ emissions estimate increased by an average of 10 percent across the time series and by 292 percent in 2020, compared to the previous Inventory. These changes were due to GHGRP submission revisions.

NO (Not Occurring)

NA (Not Applicable)

Table 3-85: Dehydrator Vents National Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Dehydrator Vents	35,716	45,457	61,754	56,543	56,405	52,323	59,207
Previous Estimate	35,716	45,457	61,386	56,381	55,967	24,345	NA

NA (Not Applicable)

Table 3-86: Dehydrator Vents National Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Dehydrator Vents	371	472	771	820	1,039	1,048	995
Previous Estimate	371	472	772	820	907	267	NA

NA (Not Applicable)

Gathering and Boosting – Flare Stacks (Recalculation with Updated Data)

The flare stacks CO_2 emissions estimate are an average of 0.3 percent lower across the time series compared with the previous Inventory. The 2020 estimate is 4 percent lower, compared to the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-87: Production Storage Tanks National Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Flare Stacks	1,355	1,725	2,256	3,696	4,777	2,822	2,631
Previous Estimate	1,355	1,725	2,256	3,695	5,028	2,926	NA

NA (Not Applicable)

Processing

Flares (Recalculation with Updated Data)

Processing segment flare CO_2 emission estimates are on average of less than 1 percent higher across the 1993 to 2020 time series than in the previous Inventory. The estimate for 2020 is 3 percent higher than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-88: Processing Segment Flares National CO₂ Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Flares	NO	3,517	5,587	5,945	9,859	8,120	7,381
Previous Estimate	NO	3,517	5,590	6,176	9,837	7,879	NA

NA (Not Applicable)

NO (Not Occurring)

AGR Vents (Recalculation with Updated Data)

AGR vents CO_2 emission estimates are on average lower than the previous Inventory by less than 1 percent across the 1990 to 2020 time series. Emission estimates for 2020 are 2 percent lower than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-89: AGR Vents National CO₂ Emissions (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
AGR Vents	28,282	15,281	17,313	16,788	16,325	17,258	18,658
Previous Estimate	28,282	15,281	17,364	16,792	16,505	17,559	NA

NA (Not Applicable)

NO (Not Occurring)

Transmission and Storage

There were no methodological updates to the transmission and storage segment, and recalculations resulted in an average increase in calculated CH₄ emissions over the time series of 0.2 percent. CO₂ emissions will be updated for the Final Inventory; see Planned Improvements.

Distribution

Mains – Unprotected Steel (Recalculation with Updated Data)

Methane emissions estimates for unprotected steel distribution mains are on average 0.6 percent lower across the 1990 to 2020 time series compared to the previous Inventory and 6 percent lower in 2020, compared to the previous Inventory. The emission changes were due to updated PHMSA pipeline mileage data.

Table 3-90: Mains – Unprotected Steel National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Mains – Unprotected Steel	231,201	91,262	44,574	42,581	40,732	39.261	37,488
Previous Estimate	231,201	91,262	47,236	45,213	43,369	41,554	NA

NA (Not Applicable)

Post-Meter

Post-Meter (Recalculation with Updated Data)

Post-Meter CH₄ emissions estimates are higher by an average of 0.1 percent across the 1990 to 2020 time series compared with the previous Inventory, and 1 percent higher in 2020, compared to the previous Inventory. The emission changes were due to changes in residential and industrial natural gas consumption data.

Table 3-91: Post-Meter National CH₄ Emissions (Metric Tons CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Post-Meter	289,951	344,464	424,492	445,323	456,679	462,751	463,072
Previous Estimate	289,951	344,464	424,492	445,220	456,551	459,072	NA

NA (Not Applicable)

Planned Improvements

Planned Improvements for 2024 Inventory

The calculations for Natural Gas Systems exploration and production segment emissions do not incorporate updated activity data for the following data inputs, due to a data base subscription lapse: oil well counts, wells drilled, wells completed, and production. Year 2020 values for activity data are used in place of year 2021. Next year's inventory will include the latest data. It is not expected that use of the latest data will result in large recalculations.

Basin-level approaches for pneumatic controllers, equipment leaks, and chemical injection pumps were applied to calculate CH₄ emissions. Feedback EPA received on this update include support for continued use of GHGRP data, that EPA should consider application of the approach to only basins with 50 percent coverage or more, and that liquids unloading is a source that may be particularly well-suited to a basin-level approach.

For the next Inventory, EPA plans to apply consistent methods for both CO₂ and CH₄ emissions calculations. EPA will also consider including additional emission sources in geographically disaggregated calculations.

Additional information on the update and specific requests for stakeholder feedback can be found in the *Disaggregation* memo and *Production Disaggregation* memos.

EPA also received feedback on its estimate for post-meter emissions. The feedback urged EPA to remove the estimate for residential post-meter emissions. EPA will continue to track studies with relevance to residential post-meter emissions for potential improvements to the Inventory for this source.

Upcoming Data, and Additional Data that Could Inform the Inventory

EPA will assess new data received by EPA's Greenhouse Gas Reporting Program, Methane Challenge Program on an ongoing basis, which may be used to validate or improve existing estimates and assumptions.

EPA continues to track studies that contain data that may be used to update the Inventory. EPA will also continue to assess studies that include and compare both top-down and bottom-up emission estimates, which could lead to improved understanding of unassigned high emitters (e.g., identification of emission sources and information on frequency of high emitters) as recommended in previous stakeholder comments.

3.8 Abandoned Oil and Gas Wells (CRF Source Categories 1B2a and 1B2b)

The term "abandoned wells", as used in the Inventory, encompasses various types of oil and gas wells, including orphaned wells and other non-producing wells:

- Wells with no recent production, and not plugged. Common terms (such as those used in state databases) might include: inactive, temporarily abandoned, shut-in, dormant, and idle.
- Wells with no recent production and no responsible operator. Common terms might include: orphaned, deserted, long-term idle, and abandoned.
- Wells that have been plugged to prevent migration of gas or fluids.

The U.S. population of abandoned oil and gas wells (including orphaned wells and other non-producing wells) is around 3.7 million (with around 2.9 million abandoned oil wells and 0.8 million abandoned gas wells). The methods to calculate emissions from abandoned wells involve calculating the total populations of plugged and unplugged abandoned oil and gas wells in the United States and the application of emission factors. An estimate of the number of orphaned wells within this population is not developed as part of the methodology. Wells that are plugged have much lower average emissions than wells that are unplugged (less than 1 kg CH₄ per well per year, versus over 100 kg CH₄ per well per year). Around 42 percent of the abandoned well population in the United States is plugged. This fraction has increased over the Inventory time series (from around 22 percent in 1990) as more wells fall under regulations and programs requiring or promoting plugging of abandoned wells.

Abandoned oil wells. Abandoned oil wells emitted 231 kt CH₄ and 5 kt CO₂ in 2021. Emissions of both gases increased by 3 percent from 1990, while the total population of abandoned oil wells increased 37 percent.

Abandoned gas wells. Abandoned gas wells emitted 63 kt CH₄ and 3 kt CO₂ in 2021. Emissions of both gases increased by 25 percent from 1990, while the total population of abandoned gas wells increased 75 percent.

Table 3-92: CH₄ Emissions from Abandoned Oil and Gas Wells (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	6.3	6.5	6.5	6.5	6.5	6.5	6.5
Abandoned Gas Wells	1.4	1.6	1.8	1.8	1.8	1.8	1.8
Total	7.7	8.1	8.3	8.3	8.3	8.2	8.2

Table 3-93: CH₄ Emissions from Abandoned Oil and Gas Wells (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	223	232	232	232	233	231	231
Abandoned Gas Wells	51	57	63	63	64	63	63
Total	274	289	295	296	297	295	295

Table 3-94: CO₂ Emissions from Abandoned Oil and Gas Wells (MMT CO₂)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	+	+	+	+	+	+	+
Abandoned Gas Wells	+	+	+	+	+	+	+
Total	+	+	+	+	+	+	+

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Table 3-95: CO₂ Emissions from Abandoned Oil and Gas Wells (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	5	5	5	5	5	5	5
Abandoned Gas Wells	2	2	3	3	3	3	3
Total	7	7	7	7	8	7	7

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

EPA uses a Tier 2 method from IPCC (2019) to quantify emissions from abandoned oil and gas wells. EPA's approach is based on the number of plugged and unplugged abandoned wells in the Appalachian region and in the rest of the U.S., and emission factors for plugged and unplugged abandoned wells in Appalachia and the rest of the U.S. Methods for abandoned wells are unavailable in IPCC (2006). The details of this approach and of the data sources used are described in the memorandum *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Abandoned Wells in Natural Gas and Petroleum Systems (2018 Abandoned Wells Memo)*.

EPA developed abandoned well CH₄ emission factors using data from Kang et al. (2016) and Townsend-Small et al. (2016). Plugged and unplugged abandoned well CH₄ emission factors were developed at the national-level (using emission data from Townsend-Small et al.) and for the Appalachia region (using emission data from measurements in Pennsylvania and Ohio conducted by Kang et al. and Townsend-Small et al., respectively). The Appalachia region emissions factors were applied to abandoned wells in states in the Appalachian basin region, and the national-level emission factors were applied to abandoned wells in all other states. EPA developed abandoned well CO₂ emission factors using the CH₄ emission factors and an assumed ratio of CO₂-to-CH₄ gas content, similar to the approach used to calculate CO₂ emissions for many sources in Petroleum Systems and Natural Gas Systems. For abandoned oil wells, EPA used the Petroleum Systems default production segment associated gas ratio of 0.020 MT CO₂/MT CH₄, which was derived through API TankCalc modeling runs. For abandoned gas wells, EPA used the Natural Gas Systems default production segment CH₄ and CO₂ gas content values (GRI/EPA 1996, GTI 2001) to develop a ratio of 0.044 MT CO₂/MT CH₄. The same respective emission factors are applied for each year of the time series.

EPA developed state-level annual counts of abandoned wells for 1990 through 2020 by summing together an annual estimate of abandoned wells in the Enverus data set (Enverus 2021), and an estimate of total abandoned wells not included the Enverus dataset (see 2018 Abandoned Wells Memo for additional information on how the value was calculated) for each state. References reviewed to develop the number of abandoned wells not included in the Enverus dataset include historical records collected by state agencies and by USGS.

The total abandoned well population was then split into plugged and unplugged wells by applying an assumption that all abandoned wells were unplugged in 1950 and using Enverus data to calculate the fraction of plugged abandoned wells in 2020 in that data set, which was then applied to the total population of abandoned wells for

2020 and 2021. Linear interpolation was applied between the 1950 value and 2020 value to calculate the plugged fraction for intermediate years. See the memorandum *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Abandoned Wells in Natural Gas and Petroleum Systems (2018 Abandoned Wells Memo)* for details. ⁸⁴ Statelevel plugged and unplugged fractions were developed for the time-series using state-level Enverus data for 2020 and linear interpolation between 1950 and 2020 plugged and unplugged fractions. Abandoned wells in all states were assumed to be unplugged in 1950.

Abandoned Oil Wells

Table 3-96: Abandoned Oil Wells Activity Data, CH₄ and CO₂ Emissions (kt)

Source	1990	2005	2017	2018	2019	2020	2021
Plugged abandoned oil wells	474,432	799,331	1,105,366	1,139,476	1,175,867	1,192,907	1,192,907
Unplugged abandoned oil							
wells	1,664,717	1,749,329	1,749,813	1,751,999	1,756,573	1,739,533	1,739,533
Total Abandoned Oil Wells	2,139,149	2,548,660	2,855,179	2,891,475	2,932,440	2,932,440	2,932,440
Abandoned oil wells in							
Appalachia	23%	21%	19%	19%	19%	19%	19%
Abandoned oil wells outside							
of Appalachia	77%	79%	81%	81%	81%	81%	81%
CH₄ from plugged							
abandoned oil wells (kt)	0.20	0.30	0.39	0.40	0.41	0.42	0.42
CH₄ from unplugged							
abandoned oil wells(kt)	223.1	231.3	231.5	231.8	232.5	230.7	230.7
Total CH₄ from Abandoned							
oil wells (kt)	223.3	231.6	231.9	232.2	232.9	231.1	231.1
Total CO₂ from Abandoned	·				·		
oil wells (kt)	4.5	4.7	4.7	4.7	4.7	4.7	4.7

Abandoned Gas Wells

Table 3-97: Abandoned Gas Wells Activity Data, CH₄ and CO₂ Emissions (kt)

Source	1990	2005	2017	2018	2019	2020	2021
Plugged abandoned gas wells	107,292	206,413	332,743	342,495	353,746	358,871	358,871
Unplugged abandoned gas							
wells	349,041	397,844	440,367	442,014	444,532	439,407	439,407
Total Abandoned Gas Wells	456,333	604,257	773,110	784,509	798,278	798,278	798,278
Abandoned gas wells in							
Appalachia	29%	26%	24%	24%	25%	25%	25%
Abandoned gas wells outside							
of Appalachia	71%	74%	76%	76%	75%	75%	75%
CH₄ from plugged abandoned							
gas wells (kt)	0.07	0.12	0.17	0.18	0.19	0.19	0.19
CH₄ from unplugged							
abandoned gas wells (kt)	50.9	56.8	62.8	63.2	63.8	63.2	63.2
Total CH ₄ from Abandoned							
gas wells (kt)	50.9	56.9	63.0	63.4	64.0	63.4	63.4
Total CO ₂ from Abandoned				•	•	•	
gas wells (kt)	2.2	2.5	2.8	2.8	2.8	2.8	2.8

⁸⁴ See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 284 of 1050 PageID 3732

Uncertainty

To characterize uncertainty surrounding estimates of abandoned well emissions, EPA conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo simulation technique). See the *2018 Abandoned Wells Memo* for details of the uncertainty analysis methods. EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around total methane emissions from abandoned oil and gas wells in year 2021, then applied the calculated bounds to both CH₄ and CO₂ emissions estimates for each population. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. EPA used measurement data from the Kang et al. (2016) and Townsend-Small et al. (2016) studies to characterize the CH₄ emission factor PDFs. For activity data inputs (e.g., total count of abandoned wells, split between plugged and unplugged), EPA assigned default uncertainty bounds of ± 10 percent based on expert judgment.

The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." As a result, the understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve. The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification.

The results presented below in Table 3-98 provide the 95 percent confidence bound within which actual emissions from abandoned oil and gas wells are likely to fall for the year 2021, using the recommended IPCC methodology. Abandoned oil well CH₄ emissions in 2021 were estimated to be between 1.1 and 19.7 MMT CO₂ Eq., while abandoned gas well CH₄ emissions were estimated to be between 0.3 and 5.4 MMT CO₂ Eq. at a 95 percent confidence level. Uncertainty bounds for other years of the time series have not been calculated, but uncertainty is expected to vary over the time series.

Table 3-98: Approach 2 Quantitative Uncertainty Estimates for CH₄ and CO₂ Emissions from Petroleum and Natural Gas Systems (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a					
	Gas	(MMT CO₂ Eq.)b	(MMT C	O ₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Abandoned Oil Wells	CH ₄	6.5	1.1	19.7	-83%	+204%		
Abandoned Gas Wells	CH_4	1.8	0.3	5.4	-83%	+204%		
Abandoned Oil Wells	CO_2	0.005	0.001	0.014	-83%	+204%		
Abandoned Gas Wells	CO_2	0.003	0.0005	0.008	-83%	+204%		

^a Range of emission estimates estimated by applying the 95 percent confidence intervals obtained from the Monte Carlo Simulation analysis conducted for total abandoned oil and gas well CH₄ emissions in year 2021.

QA/QC and Verification Discussion

The emission estimates in the Inventory are continually reviewed and assessed to determine whether emission factors and activity factors accurately reflect current industry practices. A QA/QC analysis was performed for data gathering and input, documentation, and calculation. QA/QC checks are consistently conducted to minimize human error in the model calculations. EPA performs a thorough review of information associated with new studies to assess whether the assumptions in the Inventory are consistent with industry practices and whether new data is available that could be considered for updates to the estimates. As in previous years, EPA conducted

^b All reported values are rounded after calculation. As a result, lower and upper bounds may not be duplicable from other rounded values as shown in table.

early engagement and communication with stakeholders on updates prior to public review. EPA held stakeholder webinars on greenhouse gas data for oil and gas in September and November of 2022.

Recalculations Discussion

EPA updated the Inventory methodology to estimate abandoned well emissions at the state-level as an intermediate step to calculating national emissions. Previously, well counts were developed for the Appalachian region and for all other regions as a total, and plugged and unplugged fractions were developed at the national-level. In the current Inventory, EPA used abandoned well counts and plugged and unplugged fractions at the state-level to estimate emissions. The incorporation of disaggregated, state-level data will improve future versions of both the gridded and state-level greenhouse gas inventories as geographic differences in plugging rates can now be reflected. This will allow EPA to use the gridded greenhouse gas inventory for improved comparisons with atmospheric observation studies, because regions will reflect local differences. In addition, this update will improve the ability of the state-level Inventory to reflect impacts of state-level programs.

The emission factors from the previous Inventory were retained and used to estimate state-level emissions, with Appalachia-specific factors applied to states in Appalachia. The state-level emissions were then summed up to the national level. As an outcome of these revisions, total calculated abandoned well CH₄ emissions across the time series are an average of 6 percent higher than in the previous Inventory. The calculated value for 2020 is 7 percent higher than in the previous Inventory.

The main cause of increased emission estimate across the time series is the application of state-specific fractions of plugged wells, which resulted in a larger fraction of unplugged wells in Appalachia (which has a higher unplugged well emission factor than other regions) than in the previous inventory, which applied a national average plugging fraction to the entire U.S. abandoned well population.

In the previous Inventory, abandoned dry wells were proportionally allocated between abandoned oil and gas wells at the national level. In the current Inventory, dry wells are proportionally allocated to abandoned oil and gas wells at the state level. The total counts of abandoned wells changed by 0.02 percent (decrease), compared with the previous inventory. The counts of abandoned oil wells are about 1.6 percent lower across the time series compared to the previous Inventory and gas wells are about 7 percent higher.

In addition, for the current Inventory, CO₂-equivalent emissions totals have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ has increased from 25 to 28, leading to an overall increase in the calculated CO₂-equivalent emissions of CH₄.

Compared to the previous Inventory which applied 100-year GWP values from AR4, in the current Inventory (including other recalculations noted above), CO₂-equivalent CH₄ emissions increased by 16 percent on average over the time series. Emissions on a kt CH₄ basis increased by an average of 7 percent across the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

The calculations for Abandoned Oil and Gas Wells do not incorporate updated activity data for the following data inputs, due to a data base subscription lapse: abandoned well counts, and fractions of plugged and unplugged abandoned wells. Year 2020 values for activity data are used in place of year 2021. Next year's inventory will include the latest data. It is not expected that use of the latest data will result in large recalculations.

Stakeholder feedback received include comments on the total number of abandoned wells, assumptions regarding dry wells, and emission factors.

EPA will continue to assess new data and stakeholder feedback on considerations (such as potential use of emission factor data from regions not included in the measurement studies on which current emission factors are

based) to improve the abandoned well count estimates and emission factors. In future Inventories, EPA will assess data that become available from Department of Interior and Department of Energy orphan well plugging programs.

International Bunker Fuels (CRF Source Category 1: Memo Items)

Emissions resulting from the combustion of fuels used for international transport activities, termed international bunker fuels under the UNFCCC, are not included in national emission totals, but are reported separately based upon location of fuel sales. The decision to report emissions from international bunker fuels separately, instead of allocating them to a particular country, was made by the Intergovernmental Negotiating Committee in establishing the Framework Convention on Climate Change. 85 These decisions are reflected in the IPCC methodological guidance, including IPCC (2006), in which countries are requested to report emissions from ships or aircraft that depart from their ports with fuel purchased within national boundaries and are engaged in international transport separately from national totals (IPCC 2006). 86

Two transport modes are addressed under the IPCC definition of international bunker fuels: aviation and marine. 87 Greenhouse gases emitted from the combustion of international bunker fuels, like other fossil fuels, include CO₂, CH₄ and N₂O for marine transport modes, and CO₂ and N₂O for aviation transport modes. Emissions from ground transport activities—by road vehicles and trains—even when crossing international borders are allocated to the country where the fuel was loaded into the vehicle and, therefore, are not counted as bunker fuel emissions.

The 2006 IPCC Guidelines distinguish between three different modes of air traffic: civil aviation, military aviation, and general aviation. Civil aviation comprises aircraft used for the commercial transport of passengers and freight, military aviation comprises aircraft under the control of national armed forces, and general aviation applies to recreational and small corporate aircraft. The 2006 IPCC Guidelines further define international bunker fuel use from civil aviation as the fuel combusted for civil (e.g., commercial) aviation purposes by aircraft arriving or departing on international flight segments. However, as mentioned above, and in keeping with the 2006 IPCC Guidelines, only the fuel purchased in the United States and used by aircraft taking-off (i.e., departing) from the United States are reported here. The standard fuel used for civil and military aviation is kerosene-type jet fuel, while the typical fuel used for general aviation is aviation gasoline. 88

Emissions of CO₂ from aircraft are essentially a function of fuel consumption. Nitrous oxide emissions also depend upon engine characteristics, flight conditions, and flight phase (i.e., take-off, climb, cruise, decent, and landing). Recent data suggest that little or no CH₄ is emitted by modern engines (Anderson et al. 2011), and as a result, CH₄ emissions from this category are reported as zero. In jet engines, N₂O is primarily produced by the oxidation of atmospheric nitrogen, and the majority of emissions occur during the cruise phase.

International marine bunkers comprise emissions from fuels burned by ocean-going ships of all flags that are engaged in international transport. Ocean-going ships are generally classified as cargo and passenger carrying,

3-116 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁸⁵ See report of the Intergovernmental Negotiating Committee for a Framework Convention on Climate Change on the work of its ninth session, held at Geneva from 7 to 18 February 1994 (A/AC.237/55, annex I, para. 1c).

⁸⁶ Note that the definition of international bunker fuels used by the UNFCCC differs from that used by the International Civil Aviation Organization.

⁸⁷ Most emission related international aviation and marine regulations are under the rubric of the International Civil Aviation Organization (ICAO) or the International Maritime Organization (IMO), which develop international codes, recommendations, and conventions, such as the International Convention of the Prevention of Pollution from Ships (MARPOL).

⁸⁸ Naphtha-type jet fuel was used in the past by the military in turbojet and turboprop aircraft engines.

military (i.e., U.S. Navy), fishing, and miscellaneous support ships (e.g., tugboats). For the purpose of estimating greenhouse gas emissions, international bunker fuels are solely related to cargo and passenger carrying vessels, which is the largest of the four categories, and military vessels. Two main types of fuels are used on sea-going vessels: distillate diesel fuel and residual fuel oil. Carbon dioxide is the primary greenhouse gas emitted from marine shipping.

Overall, aggregate greenhouse gas emissions in 2021 from the combustion of international bunker fuels from both aviation and marine activities were $80.9 \text{ MMT CO}_2 \text{ Eq.}$, or 22.7 percent below emissions in 1990 (see Table 3-99 and Table 3-100). Emissions from international flights and international shipping voyages departing from the United States have increased by 33.0 percent and decreased by 55.1 percent, respectively, since 1990. The majority of these emissions were in the form of CO_2 ; however, small amounts of CH_4 (from marine transport modes) and N_2O were also emitted.

Table 3-99: CO₂, CH₄, and N₂O Emissions from International Bunker Fuels (MMT CO₂ Eq.)

Gas/Mode	1990	2005	2017	2018	2019	2020	2021
CO ₂	103.6	113.3	120.2	124.3	113.6	69.6	80.2
Aviation	38.2	60.2	77.8	83.0	78.3	39.8	50.8
Commercial	30.0	55.6	74.5	79.8	75.1	36.7	47.6
Military	8.2	4.6	3.3	3.2	3.2	3.1	3.2
Marine	65.4	53.1	42.4	41.3	35.4	29.9	29.4
CH ₄	0.2	0.1	0.1	0.1	0.1	0.1	0.1
Aviation	NO	NO	NO	NO	NO	NO	NO
Marine	0.2	0.1	0.1	0.1	0.1	0.1	0.1
N_2O	0.8	0.9	0.9	1.0	0.9	0.5	0.6
Aviation	0.3	0.5	0.7	0.7	0.7	0.3	0.4
Marine	0.4	0.4	0.3	0.3	0.2	0.2	0.2
Total	104.6	114.3	121.2	125.3	114.6	70.3	80.9

NO (Not Occurring)

Notes: Totals may not sum due to independent rounding. Includes aircraft cruise altitude emissions.

Table 3-100: CO₂, CH₄, and N₂O Emissions from International Bunker Fuels (kt)

Gas/Mode	1990	2005	2017	2018	2019	2020	2021
CO ₂	103,634	113,328	120.192	124,279	113,632	69,638	80,180
Aviation	38,205	60,221	77,764	82,953	78,280	39,781	50,812
Marine	65,429	53,107	42,428	41,325	35,351	29,857	29,369
CH ₄	7	5	4	4	4	3	3
Aviation	NO	NO	NO	NO	NO	NO	NO
Marine	7	5	4	4	4	3	3
N ₂ O	3	3	4	4	3	2	2
Aviation	1	2	2	3	2	1	2
Marine	2	1	1	1	1	1	1

NO (Not Occurring)

Notes: Totals may not sum due to independent rounding. Includes aircraft cruise altitude emissions.

Methodology and Time-Series Consistency

Emissions of CO_2 were for the most part estimated by applying C content and fraction oxidized factors to fuel consumption activity data. This approach is analogous to that described under Section $3.1 - CO_2$ from Fossil Fuel Combustion. Carbon content and fraction oxidized factors for jet fuel (except for commercial aviation as per below), distillate fuel oil, and residual fuel oil are the same as used for CO_2 from Fossil Fuel Combustion and are presented in Annex 2.1, Annex 2.2, and Annex 3.8 of this Inventory. Density conversions were taken from ASTM (1989) and USAF (1998). Heat content for distillate fuel oil and residual fuel oil were taken from EIA (2023) and USAF (1998), and heat content for jet fuel was taken from EIA (2023). See below for details on how emission estimates for commercial aviation were determined.

A complete description of the methodology and a listing of the various factors employed can be found in Annex 2.1. See Annex 3.8 for a specific discussion on the methodology used for estimating emissions from international bunker fuel use by the U.S. military.

Emission estimates for CH_4 and N_2O were calculated by multiplying emission factors by measures of fuel consumption by fuel type and mode. Emission factors used in the calculations of CH_4 and N_2O emissions were obtained from the *Revised 1996 IPCC Guidelines* (IPCC/UNEP/OECD/IEA 1997), which is also referenced in the *2006 IPCC Guidelines* (IPCC 2006). For aircraft emissions, the following value, in units of grams of pollutant per kilogram of fuel consumed (g/kg), was employed: 0.1 for N_2O (IPCC 2006). For marine vessels consuming either distillate diesel or residual fuel oil the following values (g/MJ), were employed: 0.315 for CH_4 and 0.08 for N_2O . Activity data for aviation included solely jet fuel consumption statistics, while the marine mode included both distillate diesel and residual fuel oil.

Activity data on domestic and international aircraft fuel consumption were developed by the U.S. Federal Aviation Administration (FAA) using radar-informed data from the FAA Enhanced Traffic Management System (ETMS) for 1990 and 2000 through 2021 as modeled with the Aviation Environmental Design Tool (AEDT). This bottom-up approach is built from modeling dynamic aircraft performance for each flight occurring within an individual calendar year. The analysis incorporates data on the aircraft type, date, flight identifier, departure time, arrival time, departure airport, arrival airport, ground delay at each airport, and real-world flight trajectories. To generate results for a given flight within AEDT, the radar-informed aircraft data is correlated with engine and aircraft performance data to calculate fuel burn and exhaust emissions. Information on exhaust emissions for inproduction aircraft engines comes from the International Civil Aviation Organization (ICAO) Aircraft Engine Emissions Databank (EDB). This bottom-up approach is in accordance with the Tier 3B method from the 2006 IPCC Guidelines (IPCC 2006).

International aviation CO₂ estimates for 1990 and 2000 through 2021 were obtained directly from FAA's AEDT model (FAA 2023). The radar-informed method that was used to estimate CO₂ emissions for commercial aircraft for 1990 and 2000 through 2021 was not possible for 1991 through 1999 because the radar dataset was not available for years prior to 2000. FAA developed Official Airline Guide (OAG) schedule-informed inventories modeled with AEDT and great circle trajectories for 1990, 2000, and 2010. Because fuel consumption and CO₂ emission estimates for years 1991 through 1999 are unavailable, consumption estimates for these years were calculated using fuel consumption estimates from the Bureau of Transportation Statistics (DOT 1991 through 2013), adjusted based on 2000 through 2005 data. See Annex 3.3 for more information on the methodology for estimating emissions from commercial aircraft jet fuel consumption.

Data on U.S. Department of Defense (DoD) aviation bunker fuels and total jet fuel consumed by the U.S. military was supplied by the Office of the Under Secretary of Defense (Installations and Environment), DoD. Estimates of the percentage of each Service's total operations that were international operations were developed by DoD. Military aviation bunkers included international operations, operations conducted from naval vessels at sea, and operations conducted from U.S. installations principally over international water in direct support of military operations at sea. Military aviation bunker fuel emissions were estimated using military fuel and operations data synthesized from unpublished data from DoD's Defense Logistics Agency Energy (DLA Energy 2022). Together, the data allow the quantity of fuel used in military international operations to be estimated. Densities for each jet fuel type were obtained from a report from the U.S. Air Force (USAF 1998). Final jet fuel consumption estimates are presented in Table 3-101. See Annex 3.8 for additional discussion of military data.

Table 3-101: Aviation Jet Fuel Consumption for International Transport (Million Gallons)

Nationality	1990	2005	2017	2018	2019	2020	2021
U.S. and Foreign Carriers	3,155	5,858	7,844	8,178	7,911	3,859	5,015
U.S. Military	862	462	326	315	318	308	321
Total	4,017	6,321	8,171	8,493	8,229	4,167	5,336

Note: Totals may not sum due to independent rounding.

In order to quantify the civilian international component of marine bunker fuels, activity data on distillate diesel and residual fuel oil consumption by cargo or passenger carrying marine vessels departing from U.S. ports were collected for individual shipping agents on a monthly basis by the U.S. Customs and Border Protection. This information was then reported in unpublished data collected by the Foreign Trade Division of the U.S. Department of Commerce's Bureau of the Census (DOC 1991 through 2022) for 1990 through 2001, 2007 through 2021, and the Department of Homeland Security's Bunker Report for 2003 through 2006 (DHS 2008). Fuel consumption data for 2002 was interpolated due to inconsistencies in reported fuel consumption data. Activity data on distillate diesel consumption by military vessels departing from U.S. ports were provided by DLA Energy (2022). The total amount of fuel provided to naval vessels was reduced by 21 percent to account for fuel used while the vessels were not-underway (i.e., in port). Data on the percentage of steaming hours underway versus not underway were provided by the U.S. Navy. These fuel consumption estimates are presented in Table 3-102.

Table 3-102: Marine Fuel Consumption for International Transport (Million Gallons)

Fuel Type	1990	2005	2017	2018	2019	2020	2021
Residual Fuel Oil	4,781	3,881	2,975	2,790	2,246	1,964	1,953
Distillate Diesel Fuel & Other	617	444	568	684	702	461	437
U.S. Military Naval Fuels	522	471	307	285	281	296	285
Total	5,920	4,796	3,850	3,759	3,229	2,721	2,674

Note: Totals may not sum due to independent rounding.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Emission estimates related to the consumption of international bunker fuels are subject to the same uncertainties as those from domestic aviation and marine mobile combustion emissions; however, additional uncertainties result from the difficulty in collecting accurate fuel consumption activity data for international transport activities separate from domestic transport activities. ⁸⁹ For example, smaller aircraft on shorter routes often carry sufficient fuel to complete several flight segments without refueling in order to minimize time spent at the airport gate or take advantage of lower fuel prices at particular airports. This practice, called tankering, when done on international flights, complicates the use of fuel sales data for estimating bunker fuel emissions. Tankering is less common with the type of large, long-range aircraft that make many international flights from the United States, however. Similar practices occur in the marine shipping industry where fuel costs represent a significant portion of overall operating costs and fuel prices vary from port to port, leading to some tankering from ports with low fuel costs.

Uncertainties exist with regard to the total fuel used by military aircraft and ships. Total aircraft and ship fuel use estimates were developed from DoD records, which document fuel sold to the DoD Components (e.g., Army, Department of Navy and Air Force) from the Defense Logistics Agency Energy. These data may not include fuel used in aircraft and ships as a result of a Service procuring fuel from, selling fuel to, trading fuel with, or giving fuel to other ships, aircraft, governments, or other entities.

Additionally, there are uncertainties in historical aircraft operations and training activity data. Estimates for the quantity of fuel actually used in Navy and Air Force flying activities reported as bunker fuel emissions had to be estimated based on a combination of available data and expert judgment. Estimates of marine bunker fuel emissions were based on Navy vessel steaming hour data, which reports fuel used while underway and fuel used while not underway. This approach does not capture some voyages that would be classified as domestic for a commercial vessel. Conversely, emissions from fuel used while not underway preceding an international voyage are reported as domestic rather than international as would be done for a commercial vessel. There is uncertainty

 $^{^{89}}$ See uncertainty discussions under section 3.1 CO $_{2}$ from Fossil Fuel Combustion.

associated with ground fuel estimates for 1997 through 2021, including estimates for the quantity of jet fuel allocated to ground transportation. Small fuel quantities may have been used in vehicles or equipment other than that which was assumed for each fuel type.

There are also uncertainties in fuel end-uses by fuel type, emissions factors, fuel densities, diesel fuel sulfur content, aircraft and vessel engine characteristics and fuel efficiencies, and the methodology used to back-calculate the data set to 1990 using the original set from 1995. The data were adjusted for trends in fuel use based on a closely correlating, but not matching, data set. All assumptions used to develop the estimate were based on process knowledge, DoD data, and expert judgments. The magnitude of the potential errors related to the various uncertainties has not been calculated but is believed to be small. The uncertainties associated with future military bunker fuel emission estimates could be reduced through revalidation of assumptions based on data regarding current equipment and operational tempo, however, it is doubtful data with more fidelity exist at this time.

Although aggregate fuel consumption data have been used to estimate emissions from aviation, the recommended method for estimating emissions of gases other than CO₂ in the 2006 IPCC Guidelines (IPCC 2006) is to use data by specific aircraft type, number of individual flights and, ideally, movement data to better differentiate between domestic and international aviation and to facilitate estimating the effects of changes in technologies. The IPCC also recommends that cruise altitude emissions be estimated separately using fuel consumption data, while landing and take-off (LTO) cycle data be used to estimate near-ground level emissions of gases other than CO₂.90

There is also concern regarding the reliability of the existing DOC (1991 through 2022) data on marine vessel fuel consumption reported at U.S. customs stations due to the significant degree of inter-annual variation.

QA/QC and Verification

In order to ensure the quality of the emission estimates from international bunker fuels, General (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and emission factor sources and methodology used for estimating CO₂, CH₄, and N₂O emissions from international bunker fuels in the United States. Emission totals for the different sectors and fuels were compared and trends were investigated. No corrective actions were necessary.

Recalculations Discussion

For the current Inventory, CO_2 -equivalent emissions of CH_4 and N_2O from international bunker fuels have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4), which was used in the previous inventories (IPCC 2007). The AR5 GWPs have been applied across the entire time series for consistency. Prior inventories used GWPs of 25 and 298 for CH_4 and N_2O , respectively. These values have been updated to 28 and 265, respectively. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2 -equivalent CH_4 emissions was a 12 percent increase and the average annual change in CO_2 -equivalent N_2O emissions was an 11 percent decrease for the time series. As a result of the change in methodology, total emissions across the time series changed by an average annual decrease of 0.1 MMT CO_2 Eq. (less than half a percent) relative to emissions results calculated using the prior GWPs. Further

3-120 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁹⁰ U.S. aviation emission estimates for CO, NO_x, and NMVOCs are reported by EPA's National Emission Inventory (NEI) Air Pollutant Emission Trends website, and reported under the Mobile Combustion section. It should be noted that these estimates are based solely upon LTO cycles and consequently only capture near ground-level emissions, which are more relevant for air quality evaluations. These estimates also include both domestic and international flights. Therefore, estimates reported under the Mobile Combustion section overestimate IPCC-defined domestic CO, NO_x, and NMVOC emissions by including landing and take-off (LTO) cycles by aircraft on international flights, but underestimate because they do not include emissions from aircraft on domestic flight segments at cruising altitudes.

discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA will evaluate data availability to update the sources for densities, energy contents, and emission factors applied to estimate emissions from aviation and marine fuels. Many are from sources from the late 1990s, such as IPCC/UNEP/OECD/IEA (1997). Potential sources with more recent data include the International Maritime Organization (IMO) greenhouse gas emission inventory, International Air Transport Association (IATA)/ICAO greenhouse gas reporting system (CORSIA), and the EPA Greenhouse Gas Reporting Program (GHGRP) Technical Support Document for Petroleum Products. Specifically, EPA will evaluate data availability to support updating the heat contents and carbon contents of jet fuel with input from EIA.

A longer-term effort is underway to consider the feasibility of including data from a broader range of domestic and international sources for bunker fuels. Potential sources include the IMO greenhouse gas emission inventory, data from the U.S. Coast Guard on vehicle operation currently used in criteria pollutant modeling, data from the International Energy Agency (IEA), relevant updated FAA models to improve aviation bunker fuel estimates, and researching newly available marine bunker data.

3.10 Biomass and Biofuels Consumption (CRF Source Category 1A)

The combustion of biomass—such as wood, charcoal, the biogenic portions of MSW, and wood waste and biofuels such as ethanol, biogas, and biodiesel—generates CO_2 in addition to CH_4 and N_2O already covered in this chapter. In line with the reporting requirements for inventories submitted under the UNFCCC, CO_2 emissions from biomass and biofuel combustion have been estimated separately from fossil fuel CO_2 emissions and are not directly included in the energy sector contributions to U.S. totals. In accordance with IPCC methodological guidelines, any such emissions are calculated by accounting for net carbon fluxes from changes in biogenic C reservoirs in wooded or crop lands. For a more complete description of this methodological approach, see the Land Use, Land-Use Change, and Forestry chapter (Chapter 6), which accounts for the contribution of any resulting CO_2 emissions to U.S. totals within the Land Use, Land-Use Change, and Forestry sector's approach.

Therefore, CO_2 emissions from biomass and biofuel consumption are not included specifically in summing energy sector totals. However, they are presented here for informational purposes and to provide detail on biomass and biofuels consumption.

In 2021, total CO_2 emissions from the burning of woody biomass in the industrial, residential, commercial, and electric power sectors were approximately 204.8 MMT CO_2 Eq. (204,848 kt) (see Table 3-103 and Table 3-104). As the largest consumer of woody biomass, the industrial sector was responsible for 62.6 percent of the CO_2 emissions from this source. The residential sector was the second largest emitter, constituting 23.3 percent of the total, while the electric power and commercial sectors accounted for the remainder.

Table 3-103: CO₂ Emissions from Wood Consumption by End-Use Sector (MMT CO₂ Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Industrial	135.3	136.3	135.4	134.4	132.1	127.3	128.2
Residential	59.8	44.3	44.3	54.1	56.3	45.5	47.8
Commercial	6.8	7.2	8.6	8.7	8.7	8.6	8.5
Electric Power	13.3	19.1	23.6	22.8	20.7	19.1	20.3
Total	215.2	206.9	212.0	220.0	217.7	200.4	204.8

Table 3-104: CO₂ Emissions from Wood Consumption by End-Use Sector (kt)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Industrial	135,348	136,269	135,386	134,417	132,069	127,301	128,209
Residential	59,808	44,340	44,298	54,124	56,253	45,452	47,823
Commercial	6,779	7,218	8,634	8,669	8,693	8,554	8,528
Electric Power	13,252	19,074	23,647	22,795	20,677	19,115	20,288
Total	215,186	206,901	211,965	220,005	217,692	200,421	204,848

Note: Totals may not sum due to independent rounding.

Carbon dioxide emissions from combustion of the biogenic components of MSW by the electric power sector were an estimated 15.3 MMT CO_2 (15,329 kt) in 2021. Emissions across the time series are shown in Table 3-105 and Table 3-106. As discussed in Section 3.3, MSW is combusted to produce electricity and the CO_2 emissions from the fossil portion of the MSW (e.g., plastics, textiles, etc.) are included in the energy sector FFC estimates. The MSW also includes biogenic components (e.g., food waste, yard trimmings, natural fibers) and the CO_2 emissions associated with that biogenic portion is included here.

Table 3-105: CO₂ Emissions from Biogenic Components of MSW (MMT CO₂ Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Electric Power	18.5	14.7	16.1	16.1	15.7	15.6	15.3

Table 3-106: CO₂ Emissions from Biogenic Components of MSW (kt)

End-Use Sector	1990	2005	2	2017	2018	2019	2020	2021
Electric Power	18,534	14,722	16	,130	16,115	15,709	15,614	15,329

The transportation sector is responsible for most of the fuel ethanol consumption in the United States. Ethanol used for fuel is currently produced primarily from corn grown in the Midwest, but it can be produced from a variety of biomass feedstocks. Most ethanol for transportation use is blended with gasoline to create a 90 percent gasoline, 10 percent by volume ethanol blend known as E-10 or gasohol.

In 2021, the United States transportation sector consumed an estimated 1,101.7 trillion Btu of ethanol (95 percent of total), and as a result, produced approximately 75.4 MMT CO₂ Eq. (75,417 kt) (see Table 3-107 and Table 3-108) of CO₂ emissions. Smaller quantities of ethanol were also used in the industrial and commercial sectors. Ethanol fuel production and consumption has grown significantly since 1990 due to the favorable economics of blending ethanol into gasoline and federal policies that have encouraged use of renewable fuels.

Table 3-107: CO₂ Emissions from Ethanol Consumption (MMT CO₂ Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportationa	4.1	21.6	77.7	78.6	78.7	68.1	75.4
Industrial	0.1	1.2	1.9	1.4	1.6	1.6	1.5
Commercial	0.1	0.2	2.5	1.9	2.2	2.2	2.1
Total	4.2	22.9	82.1	81.9	82.6	71.8	79.1

^a See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels. Note: Totals may not sum due to independent rounding.

Table 3-108: CO₂ Emissions from Ethanol Consumption (kt)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportationa	4,059	21,616	77,671	78,603	78,739	68,085	75,417
Industrial	105	1,176	1,868	1,404	1,610	1,582	1,509
Commercial	63	151	2,550	1,910	2,229	2,182	2,139
Total	4,227	22,943	82,088	81,917	82,578	71,848	79,064

^a See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels. Note: Totals may not sum due to independent rounding.

The transportation sector is assumed to be responsible for all of the biodiesel consumption in the United States (EIA 2023a). Biodiesel is currently produced primarily from soybean oil, but it can be produced from a variety of biomass feedstocks including waste oils, fats, and greases. Biodiesel for transportation use appears in low-level blends (less than 5 percent) with diesel fuel, high-level blends (between 6 and 20 percent) with diesel fuel, and 100 percent biodiesel (EIA 2023b).

In 2021, the United States consumed an estimated 218.2 trillion Btu of biodiesel, and as a result, produced approximately 16.1 MMT CO_2 Eq. (16,112 kt) (see Table 3-109 and Table 3-110) of CO_2 emissions. Biodiesel production and consumption has grown significantly since 2001 due to the favorable economics of blending biodiesel into diesel and federal policies that have encouraged use of renewable fuels (EIA 2023b). There was no measured biodiesel consumption prior to 2001 EIA (2023a).

Table 3-109: CO₂ Emissions from Biodiesel Consumption (MMT CO₂ Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportationa	NO	0.9	18.7	17.9	17.1	17.7	16.1

NO (Not Occurring)

Table 3-110: CO₂ Emissions from Biodiesel Consumption (kt)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportationa	NO	856	18,705	17,936	17,080	17,678	16,112

NO (Not Occurring)

Methodology and Time-Series Consistency

Woody biomass emissions were estimated by applying two gross heat contents from EIA (Lindstrom 2006) to U.S. consumption data (EIA 2023a) (see Table 3-112), provided in energy units for the industrial, residential, commercial, and electric power sectors. One heat content (16.95 MMBtu/MT wood and wood waste) was applied to the industrial sector's consumption, while the other heat content (15.43 MMBtu/MT wood and wood waste) was applied to the consumption data for the other sectors. An EIA emission factor of 0.434 MT C/MT wood (Lindstrom 2006) was then applied to the resulting quantities of woody biomass to obtain CO₂ emission estimates. The woody biomass is assumed to contain black liquor and other wood wastes, have a moisture content of 12 percent, and undergo complete combustion to be converted into CO₂.

Data for total waste incinerated, excluding tires, from 1990 to 2021 was derived following the methodology described in Section 3.3. Biogenic CO_2 emissions associated with MSW combustion were obtained from EPA's GHGRP FLIGHT data for MSW combustion sources (EPA 2022). Dividing biogenic CO_2 emissions from GHGRP FLIGHT data for MSW combustors by estimated MSW tonnage combusted yielded an annual biogenic CO_2 emission factor. This approach follows the same approach used to develop the fossil CO_2 emissions from MSW combustion as discussed in Section 3.3. As this data was only available following 2011, all years prior use an average of the emission factors from 2011 through 2015.

Biogenic CO₂ emissions from MSW combustion were calculated by multiplying the annual tonnage estimates, excluding tires, by the calculated emissions factor. Calculated biogenic CO₂ emission factors are shown in Table 3-111.

Table 3-111: Calculated Biogenic CO₂ Content per Ton Waste (kg CO₂/Short Ton Combusted)

	1990	2005	2017	2018	2019	2020	2021
CO ₂ Emission Factors	556	556	564	553	558	566	550

^a See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels.

^a See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels.

The amount of ethanol allocated across the transportation, industrial, and commercial sectors was based on the sector allocations of ethanol-blended motor gasoline. The sector allocations of ethanol-blended motor gasoline were determined using a bottom-up analysis conducted by EPA, as described in the Methodology section of Fossil Fuel Combustion. Total U.S. ethanol consumption from EIA (2023a) was allocated to individual sectors using the same sector allocations as ethanol-blended motor gasoline. The emissions from ethanol consumption were calculated by applying an emission factor of 18.67 MMT C/Qbtu (EPA 2010) to adjusted ethanol consumption estimates (see Table 3-113). The emissions from biodiesel consumption were calculated by applying an emission factor of 20.1 MMT C/Qbtu (EPA 2010) to U.S. biodiesel consumption estimates that were provided in energy units (EIA 2023a) (see Table 3-114).91

Table 3-112: Woody Biomass Consumption by Sector (Trillion Btu)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Industrial	1,441.9	1,451.7	1,442.3	1,432.0	1,407.0	1,356.2	1,365.9
Residential	580.0	430.0	429.6	524.9	545.5	440.8	463.8
Commercial	65.7	70.0	83.7	84.1	84.3	83.0	82.7
Electric Power	128.5	185.0	229.3	221.1	200.5	185.4	196.7
Total	2,216.2	2,136.7	2,185.0	2,262.0	2,237.3	2,065.3	2,109.1

Note: Totals may not sum due to independent rounding.

Table 3-113: Ethanol Consumption by Sector (Trillion Btu)

End-Use Sector	1990	2005		2017	2018	2019	2020	2021
Transportation	59.3	315.8	1	,134.6	1,148.2	1,150.2	994.6	1,101.7
Industrial	1.5	17.2		27.3	20.5	23.5	23.1	22.0
Commercial	0.9	2.2		37.2	27.9	32.6	31.9	31.2
Total	61.7	335.1	1	.199.1	1.196.6	1.206.3	1.049.5	1.155.0

Note: Totals may not sum due to independent rounding.

Table 3-114: Biodiesel Consumption by Sector (Trillion Btu)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	NO	11.6	253.3	242.9	231.3	239.4	218.2

NO (Not Occurring)

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

It is assumed that the combustion efficiency for biomass is 100 percent, which is believed to be an overestimate of the efficiency of biomass combustion processes in the United States. Decreasing the combustion efficiency would decrease emission estimates for CO₂. Additionally, the heat content applied to the consumption of woody biomass in the residential, commercial, and electric power sectors is unlikely to be a completely accurate representation of the heat content for all the different types of woody biomass consumed within these sectors. Emission estimates from ethanol and biodiesel production are more certain than estimates from woody biomass consumption due to better activity data collection methods and uniform combustion techniques.

⁹¹ CO $_2$ emissions from biodiesel do not include emissions associated with the C in the fuel that is from the methanol used in the process. Emissions from methanol use and combustion are assumed to be accounted for under Non-Energy Use of Fuels. See Annex 2.3 – Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 295 of 1050 PageID 3743

Recalculations Discussion

The CO_2 emissions associated with the biogenic components of MSW were added to this year's report. The emissions were calculated based on the same approach used to develop fossil CO_2 emissions from the fossil components of MSW as described in Section 3.3.

Planned Improvements

Future research will investigate the availability of data on woody biomass heat contents and carbon emission factors to see if there are newer, improved data sources available for these factors.

Currently, emission estimates from biomass and biomass-based fuels included in this Inventory are limited to woody biomass, biogenic components of MSW, ethanol, and biodiesel. Additional forms of biomass-based fuel consumption include biogas, and other renewable diesel fuels. EPA will investigate additional forms of biomass-based fuel consumption, research the availability of relevant emissions factors, and integrate these into the Inventory as feasible. EPA will examine EIA data on biogas and other renewable diesel fuels to see if these fuel types can be included in future Inventories. EIA (2023a) natural gas data already deducts biogas used in the natural gas supply, so no adjustments are needed to the natural gas fuel consumption data to account for biogas. Distillate fuel statistics are adjusted in this Inventory to remove other renewable diesel fuels as well as biodiesel. Additionally, options for including "Other Renewable Fuels," as defined by EIA, will be evaluated.

The availability of facility-level combustion emissions through EPA's GHGRP will be examined to help better characterize the industrial sector's energy consumption in the United States and further classify woody biomass consumption by business establishments according to industrial economic activity type. Most methodologies used in EPA's GHGRP are consistent with IPCC, although for EPA's GHGRP, facilities collect detailed information specific to their operations according to detailed measurement standards, which may differ with the more aggregated data collected for the Inventory to estimate total, national U.S. emissions. In addition, and unlike the reporting requirements for this chapter under the UNFCCC reporting guidelines, some facility-level fuel combustion emissions reported under EPA's GHGRP may also include industrial process emissions. ⁹²

In line with UNFCCC reporting guidelines, fuel combustion emissions are included in this chapter, while process emissions are included in the Industrial Processes and Product Use chapter of this report. In examining data from EPA's GHGRP that would be useful to improve the emission estimates for the CO₂ from biomass combustion category, particular attention will also be made to ensure time-series consistency, as the facility-level reporting data from EPA's GHGRP are not available for all inventory years as reported in this Inventory. Additionally, analyses will focus on aligning reported facility-level fuel types and IPCC fuel types per the national energy statistics, ensuring CO₂ emissions from biomass are separated in the facility-level reported data, and maintaining consistency with national energy statistics provided by EIA. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.⁹³

3.11 Energy Sources of Precursor Greenhouse Gases

Energy 3-125

⁹² See https://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf#page=2.

⁹³ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

In addition to the main greenhouse gases addressed above, energy-related activities are also sources of greenhouse gas precursors. The reporting requirements of the UNFCCC⁹⁴ request that information should be provided on precursor emissions, which include carbon monoxide (CO), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), and sulfur dioxide (SO₂). These gases are not direct greenhouse gases, but indirectly impact Earth's radiative balance by altering the concentrations of greenhouse gases (e.g., tropospheric ozone) and atmospheric aerosol (e.g., particulate sulfate). Total emissions of NO_x, CO, NMVOCs, and SO₂ from energy-related activities from 1990 to 2021 are reported in Table 3-115.

Table 3-115: NO_x, CO, NMVOC, and SO₂ Emissions from Energy-Related Activities (kt)

Gas/ Activity	1990	2005	2017	2018	2019	2020	2021
NO _x	21,966	18,196	7,165	6,812	6,503	5,630	5,684
Fossil Fuel Combustion	21,678	18,188	7,157	6,804	6,496	5,624	5,678
Transportation ^a	12,132	12,628	4,848	4,486	4,322	3,618	3,616
Industrial	2,476	1,487	795	820	800	751	750
Electric Power Sector	6,045	3,440	1,048	1,025	898	762	819
Commercial	451	288	185	186	187	193	192
Residential	<i>575</i>	346	281	288	290	300	300
Petroleum and Natural Gas Systems	288	8	8	7	7	7	6
International Bunker Fuels	1,953	1,699	1,475	1,456	1,280	977	1,008
CO	124,685	63,891	30,530	30,237	29,854	27,897	28,773
Fossil Fuel Combustion	124,353	63,686	30,345	30,050	29,660	27,703	28,587
Transportation ^a	119,478	59,540	26,776	26,024	25,621	23,546	24,430
Residential	3,620	2,393	2,272	2,751	2,860	2,968	2,968
Industrial	705	977	615	620	600	670	670
Electric Power Sector	329	582	533	505	428	362	362
Commercial	220	195	149	151	151	157	157
Petroleum and Natural Gas Systems	332	205	185	186	194	194	185
International Bunker Fuels	102	131	153	158	150	83	101
NMVOCs	12,377	8,169	5,055	5,094	5,031	4,866	4,943
Fossil Fuel Combustion	11,793	6,079	2,702	2,632	2,593	2,391	2,469
Transportationa	10,932	5,608	2,267	2,127	2,072	1,846	1,923
Residential	693	322	315	382	397	431	431
Commercial	9	18	13	14	14	14	14
Industrial	117	87	77	80	81	74	74
Electric Power Sector	43	44	29	30	29	26	26
Petroleum and Natural Gas Systems	584	2,090	2,353	2,462	2,438	2,475	2,475
International Bunker Fuels	57	54	50	50	45	32	34
SO ₂	22,100	13,530	1,968	1,880	1,555	1,331	1,489
Fossil Fuel Combustion	21,482	13,235	1,863	1,770	1,447	1,138	1,296
Electric Power Sector	14,432	9,436	1,254	1,189	921	<i>758</i>	911
Industrial	2,886	1,378	271	259	234	172	173
Transportationa	793	724	46	45	40	23	27
Commercial	485	318	21	18	19	13	13
Residential	2,886	1,378	271	259	234	172	173
Petroleum and Natural Gas Systems	618	295	105	110	108	193	193
International Bunker Fuels	NA	NA	NA	NA	NA	NA	NA

NA (Not Applicable)

Note: Totals may not sum due to independent rounding.

^a The scope of the NEI for aircraft related precursor emissions included under the transportation is different from UNFCCC reporting scope. The NEI precursor estimate methodology does not exclude emissions that could be considered international bunkers given local impacts from these emissions. The precursor estimates are based on modeled using FAA- and state-supplied landing and take-off data for all aircraft types (including ground support equipment and auxiliary engines) used for public, private, and military purposes.

⁹⁴ See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 297 of 1050 PageID 3745

Methodology and Time-Series Consistency

Emission estimates for 1990 through 2021 were obtained from data published on the National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data website (EPA 2023a). For Table 3-117, NEI reported emissions of CO, NO_x, NMVOCs, and SO₂ were recategorized from NEI Emissions Inventory System (EIS) sectors to source categories more closely aligned with UNFCCC reporting sectors based on discussions between the EPA GHG Inventory and NEI staff (see crosswalk documented in Annex 6.3). ⁹⁵ EIS sectors mapped to the energy sector categories in this report include: fuel combustion for electric utilities, industrial, and other; petroleum and related industries; highway vehicles; off-highway; and other mobile sources (e.g., commercial marine vessels and rail). As described in the NEI Technical Support Documentation (TSD) (EPA 2023b), NEI emissions are estimated through a combination of emissions data submitted directly to the EPA by state, local, and tribal air agencies, as well as additional information added by the Agency from EPA emissions programs, such as the emission trading program, Toxics Release Inventory (TRI), and data collected during rule development or compliance testing.

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021, which are described in detail in the NEI's TSD and on EPA's Air Pollutant Emission Trends website (EPA 2023a; EPA 2023b). No quantitative estimates of uncertainty were calculated for this source category.

⁹⁵ The NEI estimates and reports emissions from six criteria air pollutants (CAPs) and 187 hazardous air pollutants (HAPs) in support of National Ambient Air Quality Standards. EPA reported CAP emission trends are grouped into 60 sectors and 15 Tier 1 source categories, which broadly cover similar source categories to those presented in this chapter. For reporting precursor emissions in the common reporting format (CRF), EPA has mapped and regrouped emissions of greenhouse gas precursors (CO, NO_x, SO₂, and NMVOCs) from NEI's EIS sectors to better align with NIR source categories, and to ensure consistency and completeness to the extent possible. See Annex 6.3 for more information on this mapping.

Energy 3-127

4. Industrial Processes and Product Use

The Industrial Processes and Product Use (IPPU) chapter includes greenhouse gas emissions occurring from industrial processes and from the use of greenhouse gases in products. The industrial processes and product use categories included in this chapter are presented in Figure 4-1 and Figure 4-2. Greenhouse gas emissions from industrial processes can occur in two different ways. First, they may be generated and emitted as the byproducts of various non-energy-related industrial activities. Second, they may be emitted due to their use in manufacturing processes or by end-consumers. Combustion-related energy use emissions from industry are reported in Chapter 3, Energy.

In the case of byproduct emissions, the emissions are generated by an industrial process itself and are not directly a result of energy consumed during the process. For example, raw materials can be chemically or physically transformed from one state to another. This transformation can result in the release of greenhouse gases such as carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated greenhouse gases (e.g., HFC-23). The greenhouse gas byproduct generating processes included in this chapter include iron and steel production and metallurgical coke production, cement production, petrochemical production, ammonia production, lime production, other process uses of carbonates (e.g., flux stone, flue gas desulfurization, and soda ash consumption not associated with glass manufacturing), nitric acid production, adipic acid production, urea consumption for nonagricultural purposes, aluminum production, HCFC-22 production, glass production, soda ash production, ferroalloy production, titanium dioxide production, caprolactam production, zinc production, phosphoric acid production, lead production, and silicon carbide production and consumption.

Greenhouse gases that are used in manufacturing processes or by end-consumers include man-made compounds such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₀), and nitrogen trifluoride (NF₃). The present contribution of HFCs, PFCs, SF₆, and NF₃ gases to the radiative forcing effect of all anthropogenic greenhouse gases is small; however, because of their extremely long lifetimes, many of them will continue to persist in the atmosphere long after they were first released. In addition, many of these gases have high global warming potentials; SF₆ is the most potent greenhouse gas the Intergovernmental Panel on Climate Change (IPCC) has evaluated. Use of HFCs is growing rapidly since they are the primary substitutes for ozone depleting substances (ODS), which are being phased-out under the Montreal Protocol on Substances that Deplete the Ozone Layer. Hydrofluorocarbons, PFCs, SF₆, and NF₃ are employed and emitted by a number of other industrial sources in the United States, such as electronics industry, electric power transmission and distribution, aluminum production, and magnesium metal production and processing. Carbon dioxide is also consumed and emitted through various end-use applications. In addition, nitrous oxide is used in and emitted by the electronics industry and anesthetic and aerosol applications.

In 2021, IPPU generated emissions of 376.4 million metric tons of CO2 equivalent (MMT CO2 Eq.), or 5.9 percent of total U.S. greenhouse gas emissions. ¹ Carbon dioxide emissions from all industrial processes were 168.9 MMT CO₂

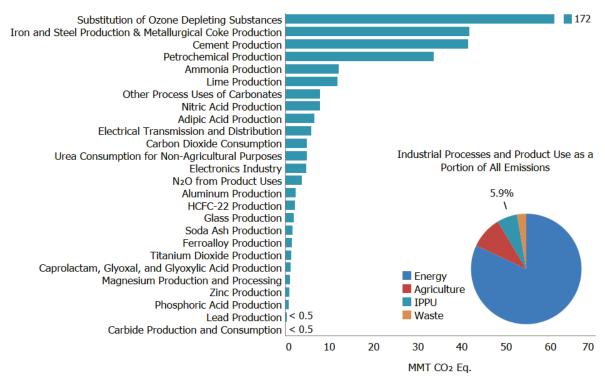
Industrial Processes and Product Use

 $^{^{1}}$ Emissions reported in the IPPU chapter include those from all 50 states, including Hawaii and Alaska, as well as from U.S. Territories.

Eq. $(168,913 \text{ kt } \text{CO}_2)$ in 2021, or 3.4 percent of total U.S. CO_2 emissions. Methane emissions from industrial processes resulted in emissions of approximately 0.4 MMT CO_2 Eq. $(16 \text{ kt } \text{CH}_4)$ in 2021, which was 0.1 percent of U.S. CH_4 emissions. Nitrous oxide emissions from IPPU were 19.7 MMT CO_2 Eq. $(74 \text{ kt } \text{N}_2\text{O})$ in 2021, or 5.0 percent of total U.S. N_2O emissions. In 2021 combined emissions of HFCs, PFCs, SF₆, and NF₃ totaled 187.3 MMT CO_2 Eq. Total emissions from IPPU in 2021 were 12.2 percent more than 1990 emissions. Total emissions from IPPU remained relatively constant between 2020 and 2021, increasing by 3.6 percent due to offsetting trends within the sector. More information on emissions of greenhouse gas precursors emissions that also result from IPPU are presented in Section 4.27 of this chapter.

The largest source of IPPU-related emissions is the Substitution of Ozone Depleting Substances, which accounted for 45.8 percent of sector emissions in 2021. These emissions have increased by 73.5 percent since 2005, and 3.8 percent between 2020 and 2021. Iron and Steel Production and Metallurgical Coke Production was the second largest source of IPPU emissions in 2021, accounting for 11.1 percent of IPPU emissions in 2021. Cement Production was the third largest source of IPPU emissions, accounting for 11.0 percent of the sector total in 2021.

Figure 4-1: 2021 Industrial Processes and Product Use Sector Greenhouse Gas Sources



The increase in overall IPPU emissions since 1990 reflects a range of emission trends among the emission sources, as shown in Figure 4-2. Emissions resulting from most types of metal production have declined significantly since 1990, largely due to production shifting to other countries, but also due to transitions to less-emissive methods of production (in the case of iron and steel) and to improved practices (in the case of PFC emissions from aluminum production). Carbon dioxide and CH₄ emissions from some chemical production sources (e.g., petrochemical production, urea consumption for non-agricultural purposes) have increased since 1990, while emissions from other chemical production sources (e.g., ammonia production, phosphoric acid production) have decreased. Emissions from mineral sources have either increased (e.g., cement production) or not changed significantly (e.g., lime production) since 1990 and largely follow economic cycles. Hydrofluorocarbon emissions from the substitution of ODS have increased drastically since 1990 and are the largest source of IPPU emissions (45.8 percent in 2021), while the emissions of HFCs, PFCs, SF₆, and NF₃ from other sources have generally declined. Nitrous oxide emissions from the production of nitric acid have decreased. Some emission sources (e.g., adipic

acid) exhibit varied interannual trends. Trends are explained further within each emission source category throughout the chapter.

Figure 4-2: Trends in Industrial Processes and Product Use Sector Greenhouse Gas Sources

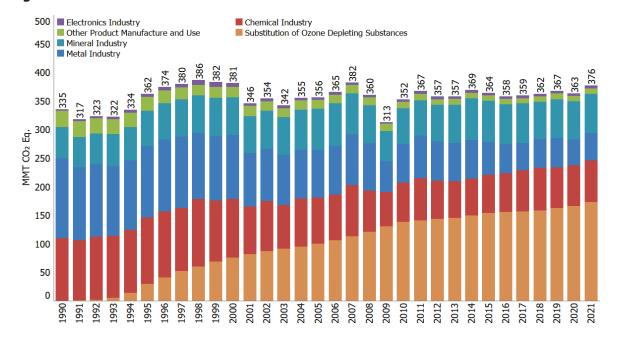


Table 4-1 summarizes emissions for the IPPU chapter in MMT CO₂ Eq. using IPCC *Fifth Assessment Report* (AR5) GWP values, following the requirements of the current United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories (IPCC 2007). Unweighted gas emissions in kt are also provided in Table 4-2. The source descriptions that follow in the chapter are presented in the order as reported to the UNFCCC in the Common Reporting Format (CRF) tables, corresponding generally to: mineral industry, chemical industry, metal industry, and emissions from the uses of HFCs, PFCs, SF₆, and NF₃.

Each year, some emission and sink estimates in the IPPU sector of the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. Key updates to this year's inventory include revisions to the Ammonia Production methodology to use GHGRP activity data for 2010 through 2021; Glass Production methodology to use additional GHGRP activity data for the years 2010 through 2020; updates to emission estimates from Urea Consumption for Non-Agricultural Purposes driven by revisions to quantities of urea applied, urea imports, and urea exports; and revisions to method for electrical equipment for estimating historical emissions for non-Partners based on the comparison with atmospheric data. Together, these methodological and data updates increased IPPU sector greenhouse gas emissions an average of 2.4 MMT CO₂ Eq. (1 percent) across the time series. In addition, estimates of CO₂-equivalent emissions totals of CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃ have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). In total, the methodological and historic data improvements in addition to the change to AR5 GWP values, the IPPU sector emissions decreased 11.3 MMT CO₂ Eq. (3.1 percent) across the time series. For

_

² See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

more information on specific methodological updates, please see the Recalculations Discussion section for each category in this chapter.

Table 4-1: Emissions from Industrial Processes and Product Use (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	214.0	195.4	166.2	165.9	170.0	161.8	168.9
Iron and Steel Production &							
Metallurgical Coke Production	104.7	70.1	40.8	42.9	43.1	37.7	41.7
Iron and Steel Production	99.1	66.2	38.8	41.6	40.1	35.4	38.4
Metallurgical Coke Production	5.6	3.9	2.0	1.3	3.0	2.3	3.2
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Petrochemical Production	21.6	27.4	28.9	29.3	30.7	29.8	33.2
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-							
Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and							
Consumption	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Substitution of Ozone Depleting							
Substancesa	+	+	+	+	+	+	+
Magnesium Production and							
Processing	0.1	+	+	+	+	+	+
CH ₄	0.3	0.1	0.3	0.4	0.4	0.4	0.4
Petrochemical Production	0.2	0.1	0.3	0.3	0.4	0.3	0.4
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and							
Consumption	+	+	+	+	+	+	+
Iron and Steel Production &							
Metallurgical Coke Production	+	+	+	+	+	+	+
Iron and Steel Production	+	+	+	+	+	+	+
Metallurgical Coke Production	NO						
N ₂ O	29.6	22.2	20.2	23.1	18.7	20.8	19.7
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
N₂O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Caprolactam, Glyoxal, and Glyoxylic							
Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Electronics Industry	+	0.1	0.2	0.2	0.2	0.3	0.3
HFCs	39.0	116.4	160.8	160.9	165.4	168.2	175.1
Substitution of Ozone Depleting							
Substances ^a	0.3	99.4	156.1	157.7	161.9	166.1	172.4
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Electronics Industry	0.2	0.2	0.3	0.3	0.3	0.3	0.4

Magnesium Production and							
Processing	NO	NO	0.1	0.1	0.1	0.1	+
PFCs	21.8	6.1	3.8	4.3	4.0	3.9	3.5
Electronics Industry	2.5	3.0	2.7	2.8	2.5	2.4	2.6
Aluminum Production	19.3	3.1	1.0	1.4	1.4	1.4	0.9
Substitution of Ozone Depleting							
Substances	NO	+	+	+	+	+	+
Electrical Transmission and							
Distribution	NO	+	+	0.0	+	+	+
SF ₆	30.5	15.5	7.2	7.1	7.8	7.5	8.0
Electrical Transmission and							
Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
Magnesium Production and							
Processing	5.4	2.9	1.0	1.1	0.9	0.9	1.1
Electronics Industry	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF ₃	+	0.4	0.5	0.5	0.5	0.6	0.6
Electronics Industry	+	0.4	0.5	0.5	0.5	0.6	0.6
Total ^b	335.4	356.1	359.1	362.2	366.8	363.2	376.4

⁺ Does not exceed 0.05 MMT CO₂ Eq.

NO (Not Occurring)

Table 4-2: Emissions from Industrial Processes and Product Use (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	214,010	195,416	166,228	165,924	169,976	161,807	168,913
Iron and Steel Production &							
Metallurgical Coke Production	104,737	70,076	40,810	42,858	43,090	37,712	41,656
Iron and Steel Production	99,129	66,156	38,832	41,576	40,084	35,387	38,432
Metallurgical Coke Production	5,608	3,921	1,978	1,282	3,006	2,325	3,224
Cement Production	33,484	46,194	40,324	38,971	40,896	40,688	41,312
Petrochemical Production	21,611	27,383	28,890	29,314	30,702	29,780	33,170
Ammonia Production	14,404	10,234	12,481	12,669	12,401	13,006	12,207
Lime Production	11,700	14,552	12,882	13,106	12,112	11,299	11,870
Other Process Uses of							
Carbonates	6,233	7,459	9,869	7,351	8,422	8,399	7,951
Carbon Dioxide Consumption	1,472	1,375	4,580	4,130	4,870	4,970	4,990
Urea Consumption for Non-							
Agricultural Purposes	3,784	3,653	5,161	6,111	6,154	5,814	4,989
Glass Production	1,928	2,402	1,984	1,989	1,940	1,858	1,969
Soda Ash Production	1,431	1,655	1,753	1,714	1,792	1,461	1,714
Ferroalloy Production	2,152	1,392	1,975	2,063	1,598	1,377	1,567
Aluminum Production	6,831	4,142	1,205	1,455	1,880	1,748	1,541
Titanium Dioxide Production	1,195	1,755	1,688	1,541	1,474	1,193	1,474
Zinc Production	632	1,030	900	999	1,026	977	969
Phosphoric Acid Production	1,529	1,342	1,025	937	909	901	909
Lead Production	516	553	513	527	531	464	446
Carbide Production and							
Consumption	243	213	181	184	175	154	172

^a Small amounts of PFC emissions also result from this source.

^b Total does not include other fluorinated gases, such as HFEs and PFPEs, which are reported separately in Section 4.23. Note: Totals may not sum due to independent rounding. Emissions of F-HTFs that are not HFCs, PFCs or SF₆ are not included in inventory totals and are included for informational purposes only in Section 4.23. Emissions presented for informational purposes include HFEs, PFPMIEs, perfluoroalkylmorpholines, and perfluorotrialkylamines.

Substitution of Ozone Depleting							
Substances ^a	+	1	3	3	3	4	4
Magnesium Production and							
Processing	128	3	3	2	2	3	3
CH ₄	11	4	11	13	15	13	16
Petrochemical Production	9	3	10	12	13	12	15
Ferroalloy Production	1	+	1	1	+	+	+
Carbide Production and							
Consumption	1	+	+	+	+	+	+
Iron and Steel Production &							
Metallurgical Coke Production	1	1	+	+	+	+	+
Iron and Steel Production	1	1	+	+	+	+	+
Metallurgical Coke Production	NO	NO	NO	NO	NO	NO	NO
N ₂ O	112	84	76	87	71	79	74
Nitric Acid Production	41	38	31	32	34	31	30
Adipic Acid Production	51	24	25	35	18	28	25
N ₂ O from Product Uses	14	14	14	14	14	14	14
Caprolactam, Glyoxal, and							
Glyoxylic Acid Production	6	7	5	5	5	4	5
Electronics Industry	+	+	1	1	1	1	1
HFCs	М	М	М	М	М	М	M
Substitution of Ozone Depleting							
Substances ^a	М	М	М	М	М	М	М
HCFC-22 Production	3	1	+	+	+	+	+
Electronics Industry	0	0	+	+	+	+	+
Magnesium Production and							
Processing	+	+	+	+	+	+	+
PFCs	М	М	М	М	М	М	М
Electronics Industry	+	+	+	+	+	+	+
Aluminum Production	М	М	М	М	М	М	М
Substitution of Ozone Depleting							
Substances	NO	+	+	+	+	+	+
Electrical Transmission and							
Distribution	NO	+	+	0	+	+	+
SF ₆	1	1	+	+	+	+	+
Electrical Transmission and							
Distribution	1	1	+	+	+	+	+
Magnesium Production and							
Processing	+	+	+	+	+	+	+
Electronics Industry	+	+	+	+	+	+	+
NF ₃	+	+	+	+	+	+	+
Electronics Industry	+	+	+	+	+	+	+

⁺ Does not exceed 0.5 kt.

This chapter presents emission estimates calculated in accordance with the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines) and its refinements. For additional detail on IPPU sources that are not included in this Inventory report, please review Annex 5, Assessment of the Sources and Sinks of Greenhouse Gas Emissions Not Included. These sources are not included due to various national circumstances, such as emissions from a source may not currently occur in the United States, data are not currently available for those emission sources (e.g., ceramics, non-metallurgical magnesium production, glyoxal and glyoxylic acid

M (Mixture of gases)

NO (Not Occurring)

^a Small amounts of PFC emissions also result from this source.

Note: Totals by gas may not sum due to independent rounding.

production, CH₄ from direct reduced iron production), emissions are included elsewhere within the Inventory report, or data suggest that emissions are not significant (e.g., other various fluorinated gas emissions from other product uses). In terms of geographic scope, emissions reported in the IPPU chapter include those from all 50 states, including Hawaii and Alaska, as well as from District of Columbia and U.S. Territories to the extent to which industries are occurring. While most IPPU sources do not occur in U.S. Territories (e.g., electronics manufacturing does not occur in U.S. Territories), they are estimated and accounted for where they are known to occur (e.g., cement production, lime production, and electrical transmission and distribution). EPA will review this on an ongoing basis to ensure emission sources are included across all geographic areas if they occur. Information on planned improvements for specific IPPU source categories can be found in the Planned Improvements section of the individual source category.

In addition, as mentioned in the Energy chapter of this report (Box 3-5), fossil fuels consumed for non-energy uses for primary purposes other than combustion for energy (including lubricants, paraffin waxes, bitumen asphalt, and solvents) are reported in the Energy chapter. According to the 2006 IPCC Guidelines, these non-energy uses of fossil fuels are to be reported under the IPPU, rather than the Energy sector; however, due to national circumstances regarding the allocation of energy statistics and carbon balance data, the United States reports these non-energy uses in the Energy chapter of this Inventory. Although emissions from these non-energy uses are reported in the Energy chapter, the methodologies used to determine emissions are compatible with the 2006 IPCC Guidelines and are well documented and scientifically based. The methodologies used are described in Section 3.2, Carbon Emitted from Non-Energy Uses of Fossil Fuels and Annex 2.3, Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels. The emissions are reported under the Energy chapter to improve transparency, report a more complete carbon balance, and avoid double counting. For example, only the emissions from the first use of lubricants and waxes are to be reported under the IPPU sector, and emissions from use of lubricants in 2-stroke engines and emissions from secondary use of lubricants and waxes in waste incineration with energy recovery are to be reported under the Energy sector. Reporting non-energy use emissions from only first use of lubricants and waxes under IPPU would involve making artificial adjustments to the nonenergy use carbon balance and could potentially result in double counting of emissions. These artificial adjustments would also be required for asphalt and road oil and solvents (which are captured as part of petrochemical feedstock emissions) and could also potentially result in double counting of emissions. For more information, see the Methodology discussion in Section 3.1, CO₂ from Fossil Fuel Combustion, Section 3.2, Carbon Emitted from Non-Energy Uses of Fossil Fuels and Annex 2.3, Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels.

Finally, as stated in the Energy chapter, portions of the fuel consumption data for seven fuel categories—coking coal, distillate fuel, industrial other coal, petroleum coke, natural gas, residual fuel oil, and other oil—are reallocated to the IPPU chapter, as they are consumed during non-energy related industrial process activity. Emissions from uses of fossil fuels as feedstocks or reducing agents (e.g., petrochemical production, aluminum production, titanium dioxide, zinc production) are reported in the IPPU chapter, unless otherwise noted due to specific national circumstances. This approach is compatible with the 2006 IPCC Guidelines and is well documented and scientifically based. The emissions from these feedstocks and reducing agents are reported under the IPPU chapter to improve transparency and to avoid double counting of emissions under both the Energy and IPPU sectors. More information on the methodology to adjust for these emissions within the Energy chapter is described in the Methodology section of CO₂ from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion [CRF Source Category 1A]) and Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion. Additional information is listed within each IPPU emission source in which this approach applies.

Box 4-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines) and its supplements and

refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and removals provided in the IPPU chapter do not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals from industrial processes and from the use of greenhouse gases in products.

QA/QC and Verification Procedures

For IPPU sources, a detailed QA/QC plan was developed and implemented for specific categories. This plan is consistent with the U.S. Inventory QA/QC plan outlined in Annex 8 but tailored to include specific procedures recommended for these sources. The IPPU QA/QC Plan does not replace the Inventory QA/QC Plan, but rather provides more context for the IPPU sector. The IPPU QA/QC Plan provides the completed QA/QC forms for each inventory reports, as well as, for certain source categories (e.g., key categories), more detailed documentation of quality control checks and recalculations due to methodological changes.

Two types of checks were performed using this plan: (1) general (Tier 1) procedures consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines that focus on annual procedures and checks to be used when gathering, maintaining, handling, documenting, checking, and archiving the data, supporting documents, and files; and (2) source category-specific (Tier 2) procedures that focus on checks and comparisons of the emission factors, activity data, and methodologies used for estimating emissions from the relevant industrial process and product use sources. Examples of these procedures include: checks to ensure that activity data and emission estimates are consistent with historical trends to identify significant changes; that, where possible, consistent and reputable data sources are used and specified across sources; that interpolation or extrapolation techniques are consistent across sources; and that common datasets, units, and conversion factors are used where applicable. The IPPU QA/QC plan also checked for transcription errors in data inputs required for emission calculations, including activity data and emission factors; and confirmed that estimates were calculated and reported for all applicable and able portions of the source categories for all years.

For sources that use data from EPA's Greenhouse Gas Reporting Program (GHGRP), EPA verifies annual facilitylevel reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. See Box 4-2 below for more information on use of GHGRP data in this chapter.

General QA/QC procedures (Tier 1) and calculation-related QC (category-specific, Tier 2) have been performed for all IPPU sources. Consistent with the 2006 IPCC Guidelines, additional category-specific QC procedures were performed for more significant emission categories (such as the comparison of reported consumption with modeled consumption using EPA's Greenhouse Gas Reporting Program (GHGRP) data within Substitution of Ozone Depleting Substances) or sources where significant methodological and data updates have taken place. The QA/QC implementation did not reveal any significant inaccuracies, and all errors identified were documented and

4-8 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

³ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

corrected. Application of these procedures, specifically category-specific QC procedures and updates/improvements as a result of QA processes (expert, public, and UNFCCC technical expert reviews), are described further within respective source categories, in the Recalculations Discussion and Planned Improvement sections.

For most IPPU categories, activity data are obtained via aggregation of facility-level data from EPA's GHGRP (see Box 4-2 below and Annex 9), national commodity surveys conducted by U.S. Geological Survey (USGS) National Minerals Information Center, U.S. Department of Energy (DOE), U.S. Census Bureau, and industry associations such as Air-Conditioning, Heating, and Refrigeration Institute (AHRI), American Chemistry Council (ACC), and American Iron and Steel Institute (AISI) (specified within each source category). The emission factors used include those derived from the EPA's GHGRP and application of IPCC default factors. Descriptions of uncertainties and assumptions for activity data and emission factors are included within the uncertainty discussion sections for each IPPU source category.

Box 4-2: Industrial Process and Product Use Data from EPA's Greenhouse Gas Reporting Program

EPA collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP). The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject CO₂ underground for sequestration or other reasons and requires reporting by sources or suppliers in 41 industrial categories. Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases.

In general, the threshold for reporting is 25,000 metric tons or more of CO₂ Eq. per year, but reporting is required for all facilities in some industries. Calendar year 2010 was the first year for which data were collected for facilities subject to 40 CFR Part 98, though some source categories first collected data for calendar year 2011. For more information, see Annex 9, Use of EPA Greenhouse Gas Reporting Program in Inventory.

EPA uses annual GHGRP data in a number of categories to improve the national estimates presented in this Inventory, consistent with IPCC guidelines (e.g., minerals, chemicals, product uses). Methodologies used in EPA's GHGRP are consistent with IPCC guidelines, including higher tier methods; however, it should be noted that the coverage and definitions for source categories (e.g., allocation of energy and IPPU emissions) in EPA's GHGRP may differ from those used in this Inventory in meeting the UNFCCC reporting guidelines (IPCC 2011) and is an important consideration when incorporating GHGRP data in the Inventory. In line with the UNFCCC reporting guidelines, the Inventory is a comprehensive accounting of all emissions from source categories identified in the 2006 IPCC Guidelines. EPA has paid particular attention to ensuring both completeness and time-series consistency for major recalculations that have occurred from the incorporation of GHGRP data into these categories, consistent with 2006 IPCC Guidelines and IPCC Technical Bulletin on Use of Facility-Specific Data in National GHG Inventories. ⁴

For certain source categories in this Inventory (e.g., nitric acid production, lime production, cement production, petrochemical production, carbon dioxide consumption, ammonia production, and urea consumption for non-agricultural purposes), EPA has integrated data values that have been calculated by aggregating GHGRP data that are considered confidential business information (CBI) at the facility level. EPA, with industry engagement, has put forth criteria to confirm that a given data aggregation shields underlying CBI from public disclosure. EPA is only publishing data values that meet these aggregation criteria. Specific uses of aggregated facility-level data are described in the respective methodological sections (e.g., including other sources using GHGRP data that is not aggregated CBI, such as aluminum, electronics industry, electrical transmission and distribution,

•

⁴ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

⁵ U.S. EPA Greenhouse Gas Reporting Program. Developments on Publication of Aggregated Greenhouse Gas Data, November 25, 2014. See http://www.epa.gov/ghgreporting/confidential-business-information-ghg-reporting.

HCFC-22 production, and magnesium production and processing). For other source categories in this chapter, as indicated in the respective planned improvements sections, ⁶ EPA is continuing to analyze how facility-level GHGRP data may be used to improve the national estimates presented in this Inventory, giving particular consideration to ensuring time-series consistency and completeness.

Additionally, EPA's GHGRP has and will continue to enhance QA/QC procedures and assessment of uncertainties within the IPPU categories (see those categories for specific QA/QC details regarding the use of GHGRP data).

Cement Production (CRF Source Category 2A1)

Cement production is an energy- and raw material-intensive process that results in the generation of carbon dioxide (CO₂) both from the energy consumed in making the clinker precursor to cement and from the chemical process to make the clinker. Emissions from fuels consumed for energy purposes during the production of cement are accounted for in the Energy chapter.

During the clinker production process, the key reaction occurs when calcium carbonate (CaCO₃), in the form of limestone or similar rocks or in the form of cement kiln dust (CKD), is heated in a cement kiln at a temperature range of about 700 to 1,000 degrees Celsius (1,300 to 1,800 degrees Fahrenheit) to form lime (i.e., calcium oxide, or CaO) and CO₂ in a process known as calcination or calcining. The quantity of CO₂ emitted during clinker production is directly proportional to the lime content of the clinker. During calcination, each mole of CaCO₃ heated in the clinker kiln forms one mole of CaO and one mole of CO₂. The CO₂ is vented to the atmosphere as part of the kiln exhaust:

$$CaCO_3 + heat \rightarrow CaO + CO_2$$

Next, over a temperature range of 1000 to 1450 degrees Celsius, the CaO combines with alumina, iron oxide and silica that are also present in the clinker raw material mix to form hydraulically reactive compounds within whitehot semifused (sintered) nodules of clinker. These "sintering" reactions are highly exothermic and produce few CO2 process emissions. The clinker is then rapidly cooled to maintain quality and then very finely ground with a small amount of gypsum and potentially other materials (e.g., ground granulated blast furnace slag, etc.) to make portland and similar cements.

Masonry cement consists of plasticizers (e.g., ground limestone, lime, etc.) and portland cement, and the amount of portland cement used accounts for approximately 3 percent of total clinker production (USGS 2022a). No additional emissions are associated with the production of masonry cement. Carbon dioxide emissions that result from the production of lime used to produce portland and masonry cement are included in Section 4.2 Lime Production (CRF Source Category 2A2).

Carbon dioxide emitted from the chemical process of cement production is the second largest source of industrial CO₂ emissions in the United States. Cement is produced in 34 states and Puerto Rico. Texas, Missouri, California, and Florida were the leading cement-producing states in 2021 and accounted for almost 44 percent of total U.S. production (USGS 2022b). In 2021, shipments of cement were estimated to have slightly increased from 2020, and net imports increased by about 20 percent compared to 2020 (USGS 2022b). Clinker production in 2021 increased by 1.5 percent, compared to 2020 (EPA 2022; USGS 2022b). In 2021, U.S. clinker production totaled 79,400 kilotons

4-10 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁶ Ammonia Production, Glass Production, Lead Production, and Other Fluorinated Gas Production.

(EPA 2022). The resulting CO₂ emissions were estimated to be 41.3 MMT CO₂ Eq. (41,312 kt) (see Table 4-3 and Table 4-4). The total construction value and cement shipments increased during the first nine months of 2021 compared to the same time period in 2020. This increase was attributed to economic recovery from the COVID-19 pandemic. Despite the slight increases, growth was constrained by increased costs, labor shortages, logistical issues, and supply chain disruptions (USGS 2022b).

Table 4-3: CO₂ Emissions from Cement Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3

Table 4-4: CO₂ Emissions from Cement Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Cement Production	33,484	46,194	40,324	38,971	40,896	40,688	41,312

Greenhouse gas emissions from cement production, which are primarily driven by production levels, increased every year from 1991 through 2006 but decreased in the following years until 2009. Since 1990, emissions have increased by 23 percent. Emissions from cement production were at their lowest levels in 2009 (2009 emissions are approximately 28 percent lower than 2008 emissions and 12 percent lower than 1990) due to the economic recession and the associated decrease in demand for construction materials. Since 2009, emissions have increased by nearly 40 percent due to increasing demand for cement. Cement continues to be a critical component of the construction industry; therefore, the availability of public and private construction funding, as well as overall economic conditions, have considerable impact on the level of cement production.

Methodology and Time-Series Consistency

Carbon dioxide emissions from cement production were estimated using the Tier 2 methodology from the 2006 IPCC Guidelines as this is a key category. The Tier 2 methodology was used because detailed and complete data (including weights and composition) for carbonate(s) consumed in clinker production are not available, 7 and thus a rigorous Tier 3 approach is impractical. Tier 2 specifies the use of aggregated plant or national clinker production data and an emission factor, which is the product of the average lime mass fraction for clinker of 65 percent and a constant reflecting the mass of CO2 released per unit of lime. The U.S. Geological Survey (USGS) mineral commodity expert for cement has confirmed that this is a reasonable assumption for the United States (Van Oss 2013a). This calculation yields an emission factor of 0.510 tons of CO2 per ton of clinker produced, which was determined as follows:

Equation 4-1: 2006 IPCC Guidelines Tier 1 Emission Factor for Clinker (precursor to Equation 2.4)

$$EF_{clinker} = 0.650 \text{ CaO} \times \left[\left(44.01 \frac{g}{\text{mole}} \text{CO}_2 \right) \div \left(56.08 \frac{g}{\text{mole}} \text{CaO} \right) \right] = 0.510 \frac{\text{tons CO}_2}{\text{ton clinker}}$$

During clinker production, some of the raw materials, partially reacted raw materials, and clinker enters the kiln line's exhaust system as non-calcinated, partially calcinated, or fully calcinated cement kiln dust (CKD). To the degree that the CKD contains carbonate raw materials which are then calcined, there are associated CO₂ emissions. At some plants, essentially all CKD is directly returned to the kiln, becoming part of the raw material feed, or is likewise returned to the kiln after first being removed from the exhaust. In either case, the returned CKD becomes

 $^{^{7}}$ As discussed further under "Planned Improvements," most cement-producing facilities that report their emissions to the GHGRP use CEMS to monitor combined process and fuel combustion emissions for kilns, making it difficult to quantify the process emissions on a facility-specific basis. In 2021, the percentage of facilities not using CEMS was 4 percent.

a raw material, thus forming clinker, and the associated CO2 emissions are a component of those calculated for the clinker overall. At some plants, however, the CKD cannot be returned to the kiln because it is chemically unsuitable as a raw material or chemical issues limit the amount of CKD that can be so reused. Any clinker that cannot be returned to the kiln is either used for other (non-clinker) purposes or is landfilled. The CO₂ emissions attributable to the non-returned calcinated portion of the CKD are not accounted for by the clinker emission factor and thus a CKD correction factor should be applied to account for those emissions. The USGS reports the amount of CKD used to produce clinker, but no information is currently available on the total amount of CKD produced annually.⁸ Because data are not currently available to derive a country-specific CKD correction factor, a default correction factor of 1.02 (2 percent) was used to account for CKD CO₂ emissions, as recommended by the IPCC (IPCC 2006).⁹ Total cement production emissions were calculated by adding the emissions from clinker production and the emissions assigned to CKD.

Small amounts of impurities (i.e., not calcium carbonate) may exist in the raw limestone used to produce clinker. The proportion of these impurities is generally minimal, although a small amount (1 to 2 percent) of magnesium oxide (MgO) may be desirable as a flux. Per the IPCC Tier 2 methodology, a correction for MgO is not used, since the amount of MgO from carbonate is likely very small and the assumption of a 100 percent carbonate source of CaO already yields an overestimation of emissions (IPCC 2006).

The 1990 through 2012 activity data for clinker production were obtained from USGS (Van Oss 2013a, Van Oss 2013b). Clinker production data for 2013 were also obtained from USGS (USGS 2014). USGS compiled the data (to the nearest ton) through questionnaires sent to domestic clinker and cement manufacturing plants, including facilities in Puerto Rico. Clinker production values in the current Inventory report utilize GHGRP data for the years 2014 through 2021 (EPA 2022). Clinker production data are summarized in Table 4-5. Details on how this GHGRP data compares to USGS reported data can be found in the section on QA/QC and Verification.

Table 4-5: Clinker Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Clinker	64,355	88,783	77,500	74,900	78,600	78,200	79,400

Notes: Clinker production from 1990 through 2021 includes Puerto Rico (relevant U.S. Territories).

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021. The methodology for cement production spliced activity data from two different sources: USGS for 1990 through 2013 and GHGRP starting in 2014. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

The uncertainties contained in these estimates are primarily due to uncertainties in the lime content of clinker and in the percentage of CKD recycled inside the cement kiln. Uncertainty is also associated with the assumption that all calcium-containing raw materials are CaCO₃, when a small percentage likely consists of other carbonate and non-carbonate raw materials. The lime content of clinker varies from 60 to 67 percent; 65 percent is used as a representative value (Van Oss 2013a). This contributes to the uncertainty surrounding the emission factor for

⁸ The USGS *Minerals Yearbook: Cement* notes that CKD values used for clinker production are likely underreported.

⁹ As stated on p. 2.12 of the 2006 IPCC Guidelines, Vol. 3, Chapter 2: "...As data on the amount of CKD produced may be scarce (except possibly for plant-level reporting), estimating emissions from lost CKD based on a default value can be considered good practice. The amount of CO₂ from lost CKD can vary but range typically from about 1.5 percent (additional CO₂ relative to that calculated for clinker) for a modern plant to about 20 percent for a plant losing a lot of highly calcinated CKD (van Oss 2005). In the absence of data, the default CKD correction factor (CFckd) is 1.02 (i.e., add 2 percent to the CO2 calculated for clinker). If no calcined CKD is believed to be lost to the system, the CKD correction factor will be 1.00 (van Oss 2005)..."

clinker which has an uncertainty range of ±3 percent with uniform densities (Van Oss 2013b). The amount of CO2 from CKD loss can range from 1.5 to 8 percent depending upon plant specifications, and uncertainty was estimated at ±5 percent with uniform densities (Van Oss 2013b). Additionally, some amount of CO2 is reabsorbed when the cement is used for construction. As cement reacts with water, alkaline substances such as calcium hydroxide are formed. During this curing process, these compounds may react with CO2 in the atmosphere to create calcium carbonate. This reaction only occurs in roughly the outer 0.2 inches of the total thickness. Because the amount of CO₂ reabsorbed is thought to be minimal, it was not estimated. EPA assigned default uncertainty bounds of ±3 percent for clinker production, based on expert judgment (Van Oss 2013b).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-6. Based on the uncertainties associated with total U.S. clinker production, the CO₂ emission factor for clinker production, and the emission factor for additional CO₂ emissions from CKD, 2021 CO₂ emissions from cement production were estimated to be between 39.5 and 43.1 MMT CO₂ Eq. at the 95 percent confidence level. This confidence level indicates a range of approximately 4 percent below and 4 percent above the emission estimate of 41.3 MMT CO2 Eq.

Table 4-6: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Cement **Production (MMT CO₂ Eq. and Percent)**

Cauman	Coo	2021 Emission Estimate	Uncertaint	y Range Relativ	Range Relative to Emission Estimate a				
Source G	Gas	(MMT CO ₂ Eq.)	(MMT C	O ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Cement Production	CO ₂	41.3	39.5	43.1	-4%	+4%			

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

EPA relied upon the latest guidance from the IPCC on the use of facility-level data in national inventories and applied a category-specific QC process to compare activity data from EPA's GHGRP with existing data from USGS surveys. This was to ensure time-series consistency of the emission estimates presented in the Inventory. Total U.S. clinker production is assumed to have low uncertainty because facilities routinely measure this for economic reasons and because both USGS and GHGRP take multiple steps to ensure that reported totals are accurate. EPA verifies annual facility-level GHGRP reports through a multi-step process that is tailored to the reporting industry (e.g., combination of electronic checks including range checks, statistical checks, algorithm checks, year-to-year comparison checks, along with manual reviews involving outside data checks) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. ¹⁰ Facilities are also required to monitor and maintain records of monthly clinker production per section 98.84 of the GHGRP regulation (40 CFR 98.84).

EPA's GHGRP requires all facilities producing Portland cement to report greenhouse gas emissions, including CO₂ process emissions from each kiln, CO₂ combustion emissions from each kiln, CH₄ and N₂O combustion emissions

¹⁰ See GHGRP Verification Fact Sheet https://www.epa.gov/sites/production/files/2015- 07/documents/ghgrp verification factsheet.pdf.

from each kiln, and CO_2 , CH_4 , and N_2O emissions from each stationary combustion unit other than kilns (40 CFR Part 98 Subpart H). Source-specific quality control measures for the Cement Production category are included in section 98.84, Monitoring and QA/QC Requirements.

As mentioned above, EPA compares GHGRP clinker production data to the USGS clinker production data. For the year 2014 and 2020, USGS and GHGRP clinker production data showed a difference of approximately 1 percent. In 2018 the difference was approximately 3 percent. In 2015, 2016, 2017, 2019, and 2021, that difference was less than 1 percent between the two sets of activity data. This difference resulted in a difference in emissions compared to USGS data of about 0.1 MMT CO_2 Eq. in 2015, 2016, 2017, 2019, and 2021. The information collected by the USGS National Minerals Information Center surveys continue to be an important data source.

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

Planned Improvements

EPA is continuing to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates for the Cement Production source category. Most cement production facilities reporting under EPA's GHGRP use Continuous Emission Monitoring Systems (CEMS) to monitor and report CO₂ emissions, thus reporting combined process and combustion emissions from kilns. In implementing further improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon, in addition to category-specific QC methods recommended by the 2006 IPCC Guidelines. ¹¹ EPA's long-term improvement plan includes continued assessment of the feasibility of using additional GHGRP information beyond aggregation of reported facility-level clinker data, in particular disaggregating the combined process and combustion emissions reported using CEMS, to separately present national process and combustion emissions streams consistent with IPCC and UNFCCC guidelines. This long-term planned analysis is still in development and has not been applied for this current Inventory.

EPA continues to review methods and data used to estimate CO₂ emissions from cement production in order to account for organic material in the raw material and to discuss the carbonation that occurs across the duration of the cement product. Work includes identifying data and studies on the average carbon content for organic materials in kiln feed in the United States and on CO₂ reabsorption rates via carbonation for various cement products. This information is not reported by facilities subject to GHGRP reporting. This is a long-term improvement.

4.2 Lime Production (CRF Source Category 2A2)

Lime is an important manufactured product with many industrial, chemical, and environmental applications. Lime production involves three main processes: stone preparation, calcination, and hydration. Carbon dioxide (CO₂) is generated during the calcination stage, when limestone—consisting of calcium carbonate (CaCO₃) and/or

4-14 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

¹¹ See IPCC Technical Bulletin on Use of Facility-Specific Data in National Greenhouse Gas Inventories http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

magnesium carbonate (MgCO₃)—is roasted at high temperatures in a kiln to produce calcium oxide (CaO) and CO₂. The CO₂ is given off as a gas and is normally emitted to the atmosphere.

$$CaCO_3 \rightarrow CaO + CO_2$$

Some facilities, however, recover CO2 generated during the production process for use in sugar refining and precipitated calcium carbonate (PCC) production. 12 PCC is used as a filler or coating in the paper, food, and plastic industries and is derived from reacting hydrated high-calcium quicklime with CO2, a production process that does not result in net emissions of CO₂ to the atmosphere. Emissions from fuels consumed for energy purposes during the production of lime are included in the Energy chapter.

For U.S. operations, the term "lime" actually refers to a variety of chemical compounds. These include CaO, or high-calcium quicklime; calcium hydroxide (Ca(OH)₂), or hydrated lime; dolomitic quicklime ([CaO•MgO]); and dolomitic hydrate ($[Ca(OH)_2 \bullet MgO]$ or $[Ca(OH)_2 \bullet Mg(OH)_2]$).

The current lime market is approximately distributed across six end-use categories, as follows: metallurgical uses, 35 percent; environmental uses, 29 percent; chemical and industrial uses, 21 percent; construction uses, 10 percent; miscellaneous uses, 3 percent; and refractory dolomite, 1 percent (USGS 2021c). The major uses are in steel making, chemical and industrial applications (such as the manufacture of fertilizer, glass, paper and pulp, and precipitated calcium carbonate, and in sugar refining), flue gas desulfurization (FGD) systems at coal-fired electric power plants, construction, and water treatment, as well as uses in mining, pulp and paper and precipitated calcium carbonate manufacturing (USGS 2022a). Lime is also used as a CO2 scrubber, and there has been experimentation on the use of lime to capture CO₂ from electric power plants. Both lime (CaO) and limestone (CaCO₃) can be used as a sorbent for FGD systems. Emissions from limestone consumption for FGD systems are reported under Section 4.4 Other Process Uses of Carbonate Production (CRF Source Category 2A4).

Emissions from lime production have fluctuated over the time series depending on lime end-use markets – primarily the steel making industry and FGD systems for utility and industrial plants – and also energy costs. One significant change to lime end-use since 1990 has been the increase in demand for lime for FGD at coal-fired electric power plants, which can be attributed to compliance with sulfur dioxide (SO2) emission regulations of the Clean Air Act Amendments of 1990. Phase I went into effect on January 1, 1995, followed by Phase II on January 1, 2000. To supply lime for the FGD market, the lime industry installed more than 1.8 million tons per year of new capacity by the end of 1995 (USGS 1996). The need for air pollution controls continued to drive the FGD lime market, which had doubled between 1990 and 2019 (USGS 1991 and 2020d).

The U.S. lime industry temporarily shut down some individual gas-fired kilns and, in some case, entire lime plants during 2000 and 2001, due to significant increases in the price of natural gas. Lime production continued to decrease in 2001 and 2002, a result of lower demand from the steel making industry, lime's largest end-use market, when domestic steel producers were affected by low priced imports and slowing demand (USGS 2002).

Emissions from lime production increased and then peaked in 2006 at approximately 30.3 percent above 1990 levels, due to strong demand from the steel and construction markets (road and highway construction projects), before dropping to its lowest level in 2009 at approximately 2.5 percent below 1990 emissions, driven by the economic recession and downturn in major markets including construction, mining, and steel (USGS 2007, 2008, 2010). In 2010, the lime industry began to recover as the steel, FGD, and construction markets also recovered (USGS 2011 and 2012a). Fluctuation in lime production since 2015 has been driven largely by demand from the steel making industry (USGS 2018b, 2019, 2020b, 2021c). In 2020, a decline in lime production was a result of plants temporarily closing as a result of the global COVID-19 pandemic (USGS 2022a).

Lime production in the United States—including Puerto Rico—was reported to be 16,774 kilotons in 2021, an increase of about 5.7 percent compared to 2020 levels (USGS 2022b). Compared to 1990, lime production

 12 The amount of CO_2 captured for sugar refining and PCC production is reported within the CRF tables under CRF Source Category 2H3 "Other", but within this report, they are included in this chapter.

increased by about 5.9 percent. At year-end 2021, 73 primary lime plants were operating in the United States, including Puerto Rico according to the USGS MCS (USGS 2022a). 13 Principal lime producing states were, in alphabetical order, Alabama, Kentucky, Missouri, Ohio, and Texas (USGS 2022a).

U.S. lime production resulted in estimated net CO₂ emissions of 11.9 MMT CO₂ Eq. (11,870 kt) (see Table 4-7 and Table 4-8). Carbon dioxide emissions from lime production increased by about 5.1 percent compared to 2020 levels. Compared to 1990, CO₂ emissions have increased by about 1.5 percent. The trends in CO₂ emissions from lime production are directly proportional to trends in production, which are described above.

Table 4-7: CO₂ Emissions from Lime Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9

Table 4-8: Gross, Recovered, and Net CO₂ Emissions from Lime Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Gross	11,959	15,074	13,283	13,609	12,676	11,875	12,586
Recovereda	259	522	401	503	564	576	716
Net Emissions	11,700	14,552	12,882	13,106	12,112	11,299	11,870

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

To calculate emissions, the amounts of high-calcium and dolomitic lime produced were multiplied by their respective emission factors, consistent with Tier 2 methodology from the 2006 IPCC Guidelines. The emission factor is the product of the stoichiometric ratio between CO2 and CaO, and the average CaO and MgO content for lime. The CaO and MgO content for lime is assumed to be 95 percent for both high-calcium and dolomitic lime (IPCC 2006). The emission factors were calculated as follows:

Equation 4-2: 2006 IPCC Guidelines Tier 2 Emission Factor for Lime Production, High-Calcium Lime (Equation 2.9)

$$EF_{High-Calcium\ Lime} = \left[\left(44.01 \frac{g}{mole} CO_2 \right) \div \left(56.08 \frac{g}{mole} CaO \right) \right] \times \left(0.9500 \frac{CaO}{lime} \right) = 0.7455 \frac{g\ CO_2}{g\ lime}$$

Equation 4-3: 2006 IPCC Guidelines Tier 2 Emission Factor for Lime Production, Dolomitic Lime (Equation 2.9)

$$\mathrm{EF_{Dolomitic\,Lime}} \ = \ \left[\left(88.02 \, \frac{\mathrm{g}}{\mathrm{mole}} \, \mathrm{CO_2} \right) \div \, \left(96.39 \, \frac{\mathrm{g}}{\mathrm{mole}} \, \mathrm{CaO} \bullet \mathrm{MgO} \right) \right] \times \\ \left(0.9500 \, \, \frac{\mathrm{CaO} \bullet \mathrm{MgO}}{\mathrm{lime}} \right) = \ 0.8675 \, \frac{\mathrm{g\,CO_2}}{\mathrm{g\,lime}} \, \mathrm{CaO} + \mathrm{MgO} = 0.00 \, \mathrm{caO} = 0.00 \, \mathrm{caO} + \mathrm{MgO} = 0.00 \, \mathrm{caO} = 0.00 \, \mathrm{caO} + \mathrm{MgO} = 0.00 \, \mathrm{caO} = 0.00$$

Production was adjusted to remove the mass of chemically combined water found in hydrated lime, determined according to the molecular weight ratios of H₂O to (Ca(OH)₂ and [Ca(OH)₂•Mg(OH)₂]) (IPCC 2006). These factors set the chemically combined water content to 27 percent for high-calcium hydrated lime, and 30 percent for dolomitic hydrated lime.

The 2006 IPCC Guidelines (Tier 2 method) also recommends accounting for emissions from lime kiln dust (LKD) through application of a correction factor. LKD is a byproduct of the lime manufacturing process typically not

^a For sugar refining and PCC production.

¹³ In 2021, 68 operating primary lime facilities in the United States reported to the EPA Greenhouse Gas Reporting Program.

recycled back to kilns. LKD is a very fine-grained material and is especially useful for applications requiring very small particle size. Most common LKD applications include soil reclamation and agriculture. Emissions from the application of lime for agricultural purposes are reported in the Agriculture chapter under 5.5 Liming (CRF Source Category 3G). Currently, data on annual LKD production is not readily available to develop a country-specific correction factor. Lime emission estimates were multiplied by a factor of 1.02 to account for emissions from LKD (IPCC 2006). See the Planned Improvements section associated with efforts to improve uncertainty analysis and emission estimates associated with LKD.

Lime emission estimates were further adjusted to account for the amount of CO₂ captured for use in on-site processes. All the domestic lime facilities are required to report these data to EPA under its GHGRP. The total national-level annual amount of CO₂ captured for on-site process use was obtained from EPA's GHGRP (EPA 2022) based on reported facility-level data for years 2010 through 2021. The amount of CO₂ captured/recovered for nonmarketed on-site process use is deducted from the total gross emissions (i.e., from lime production and LKD). The net lime emissions are presented in Table 4-7 and Table 4-8. GHGRP data on CO2 removals (i.e., CO2 captured/recovered) was available only for 2010 through 2021. Since GHGRP data are not available for 1990 through 2009, IPCC "splicing" techniques were used as per the 2006 IPCC Guidelines on time-series consistency (IPCC 2006, Volume 1, Chapter 5).

Lime production data (i.e., lime sold and non-marketed lime used by the producer) by type (i.e., high-calcium and dolomitic quicklime, high-calcium and dolomitic hydrated lime, and dead-burned dolomite) for 1990 through 2021 (see Table 4-9) were obtained from U.S. Geological Survey (USGS) Minerals Yearbook (USGS 1992 through 2022b) and are compiled by USGS to the nearest ton. Dead-burned dolomite data are additionally rounded by USGS to no more than one significant digit to avoid disclosing company proprietary data. Production data for the individual quicklime (i.e., high-calcium and dolomitic) and hydrated lime (i.e., high-calcium and dolomitic) types were not provided prior to 1997. These were calculated based on total quicklime and hydrated lime production data from 1990 through 1996 and the three-year average ratio of the individual lime types from 1997 to 1999. Natural hydraulic lime, which is produced from CaO and hydraulic calcium silicates, is not manufactured in the United States (USGS 2018a). Total lime production was adjusted to account for the water content of hydrated lime by converting hydrate to oxide equivalent based on recommendations from the IPCC and using the water content values for high-calcium hydrated lime and dolomitic hydrated lime mentioned above, and is presented in Table 4-10 (IPCC 2006). The CaO and CaO • MgO contents of lime, both 95 percent, were obtained from the IPCC (IPCC 2006).

Table 4-9: High-Calcium- and Dolomitic-Quicklime, High-Calcium- and Dolomitic-Hydrated, and Dead-Burned-Dolomite Lime Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
High-Calcium Quicklime	11,166	14,100	12,200	12,400	11,300	10,700	11,200
Dolomitic Quicklime	2,234	2,990	2,650	2,810	2,700	2,390	2,700
High-Calcium Hydrated	1,781	2,220	2,360	2,430	2,430	2,320	2,430
Dolomitic Hydrated	319	474	276	265	267	252	244
Dead-Burned Dolomite	342	200	200	200	200	200	200

Table 4-10: Adjusted Lime Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
High-Calcium	12,466	15,721	13,923	14,174	13,074	12,394	12,974
Dolomitic	2,800	3,522	3,043	3,196	3,087	2,766	3,071

Note: Minus water content of hydrated lime.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The uncertainties contained in these estimates can be attributed to slight differences in the chemical composition of lime products and CO_2 recovery rates for on-site process use over the time series. Although the methodology accounts for various formulations of lime, it does not account for the trace impurities found in lime, such as iron oxide, alumina, and silica. Due to differences in the limestone used as a raw material, a rigid specification of lime material is impossible. As a result, few plants produce lime with exactly the same properties.

In addition, a portion of the CO_2 emitted during lime production will actually be reabsorbed when the lime is consumed, especially at captive lime production facilities. As noted above, lime has many different chemical, industrial, environmental, and construction applications. In many processes, CO_2 reacts with the lime to create calcium carbonate (e.g., water softening). Carbon dioxide reabsorption rates vary, however, depending on the application. For example, 100 percent of the lime used to produce precipitated calcium carbonate reacts with CO_2 , whereas most of the lime used in steel making reacts with impurities such as silica, sulfur, and aluminum compounds. Quantifying the amount of CO_2 that is reabsorbed would require a detailed accounting of lime use in the United States and additional information about the associated processes where both the lime and byproduct CO_2 are "reused." Research conducted thus far has not yielded the necessary information to quantify CO_2 reabsorption rates. ¹⁴ Some additional information on the amount of CO_2 consumed on site at lime facilities, however, has been obtained from EPA's GHGRP.

In some cases, lime is generated from calcium carbonate byproducts at pulp mills and water treatment plants. ¹⁵ The lime generated by these processes is included in the USGS data for commercial lime consumption. In the pulping industry, mostly using the Kraft (sulfate) pulping process, lime is consumed in order to causticize a process liquor (green liquor) composed of sodium carbonate and sodium sulfide. The green liquor results from the dilution of the smelt created by combustion of the black liquor where biogenic carbon (C) is present from the wood. Kraft mills recover the calcium carbonate "mud" after the causticizing operation and calcine it back into lime—thereby generating CO₂—for reuse in the pulping process. Although this re-generation of lime could be considered a lime manufacturing process, the CO₂ emitted during this process is mostly biogenic in origin and therefore is not included in the industrial processes totals (Miner and Upton 2002). In accordance with IPCC methodological guidelines, any such emissions are calculated by accounting for net C fluxes from changes in biogenic C reservoirs in wooded or crop lands (see the Land Use, Land-Use Change, and Forestry chapter).

In the case of water treatment plants, lime is used in the softening process. Some large water treatment plants may recover their waste calcium carbonate and calcine it into quicklime for reuse in the softening process. Further research is necessary to determine the degree to which lime recycling is practiced by water treatment plants in the United States.

Another uncertainty is the assumption that calcination emissions for LKD are around 2 percent. EPA assigned uncertainty ranges of ±2 percent for the LKD correction factor based on expert judgment (RTI 2023). The National Lime Association (NLA) has commented that the estimates of emissions from LKD in the United States could be closer to 6 percent. They also note that additional emissions (approximately 2 percent) may also be generated through production of other byproducts/wastes (off-spec lime that is not recycled, scrubber sludge) at lime plants (Seeger 2013). Publicly available data on LKD generation rates, total quantities not used in cement production, and types of other byproducts/wastes produced at lime facilities are limited. NLA compiled and shared historical

4-18 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

¹⁴ Representatives of the National Lime Association estimate that CO₂ reabsorption that occurs from the use of lime may offset as much as a quarter of the CO₂ emissions from calcination (Males 2003).

¹⁵ Some carbide producers may also regenerate lime from their calcium hydroxide byproducts, which does not result in emissions of CO₂. In making calcium carbide, quicklime is mixed with coke and heated in electric furnaces. The regeneration of lime in this process is done using a waste calcium hydroxide (hydrated lime) $[CaC_2 + 2H_2O \rightarrow C_2H_2 + Ca(OH)_2]$, not calcium carbonate $[CaCO_3]$. Thus, the calcium hydroxide is heated in the kiln to simply expel the water $[Ca(OH)_2 + heat \rightarrow CaO + H_2O]$, and no CO₂ is released.

emissions information and quantities for some waste products reported by member facilities associated with generation of total calcined byproducts and LKD, as well as methodology and calculation worksheets that member facilities complete when reporting. There is uncertainty regarding the availability of data across the time series needed to generate a representative country-specific LKD factor. Uncertainty of the activity data is also a function of the reliability and completeness of voluntarily reported plant-level production data. EPA assigned uncertainty ranges of ±1 percent for lime production, based on expert judgment (USGS 2012b). Further research, including discussion with NLA and data is needed to improve understanding of additional calcination emissions to consider revising the current assumptions that are based on the 2006 IPCC Guidelines. More information can be found in the Planned Improvements section below.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-11. Lime CO₂ emissions for 2021 were estimated to be between 11.6 and 12.1 MMT CO₂ Eq. at the 95 percent confidence level. This confidence level indicates a range of approximately 2 percent below and 2 percent above the emission estimate of 11.9 MMT CO₂ Eq.

Table 4-11: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Lime **Production (MMT CO₂ Eq. and Percent)**

Source Gas	Coo	2021 Emission Estimate	1 Emission Estimate Uncertainty Range Relat					
	Gas	(MMT CO ₂ Eq.)	(MN	IT CO ₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Lime Production	CO ₂	11.9	11.6	12.1	-2%	+2%		

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as noted in the introduction of the IPPU chapter (see Annex 8 for more details).

More details on the greenhouse gas calculation, monitoring and QA/QC methods associated with reporting on CO₂ captured for onsite use applicable to lime manufacturing facilities can be found under Subpart S (Lime Manufacturing) of the GHGRP regulation (40 CFR Part 98). 16 EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2022). 17 Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

¹⁶ See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98 main 02.tpl.

¹⁷ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Planned Improvements

EPA plans to review GHGRP emissions and activity data reported to EPA under Subpart S of the GHGRP regulation (40 CFR Part 98), and aggregated activity data on lime production by type in particular. In addition, initial review of data has identified that several facilities use CEMS to report emissions. Under Subpart S, if a facility is using a CEMS, they are required to report combined combustion emissions and process emissions. EPA continues to review how best to incorporate GHGRP and notes that particular attention will be made to also ensuring timeseries consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required because the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon. ¹⁸

Future improvements involve improving and/or confirming the representativeness of current assumptions associated with emissions from production of LKD and other byproducts/wastes as discussed in the Uncertainty section, per comments from the NLA provided during a prior Public Review comment period for a previous Inventory (i.e., 1990 through 2018). EPA met with NLA in summer of 2020 for clarification on data needs and available data and to discuss planned research into GHGRP data. Previously, EPA met with NLA in spring of 2015 to outline specific information required to apply IPCC methods to develop a country-specific correction factor to more accurately estimate emissions from production of LKD. In 2016, NLA compiled and shared historical emissions information reported by member facilities on an annual basis under voluntary reporting initiatives from 2002 through 2011 associated with generation of total calcined byproducts and LKD. Reporting of LKD was only differentiated for the years 2010 and 2011. This emissions information was reported on a voluntary basis consistent with NLA's facility-level reporting protocol, which was also provided to EPA. To reflect information provided by NLA, EPA updated the qualitative description of uncertainty. At the time of this Inventory, this planned improvement is in process and has not been incorporated into this current Inventory report.

4.3 Glass Production (CRF Source Category 2A3)

Glass production is an energy and raw-material intensive process that results in the generation of carbon dioxide (CO₂) from both the energy consumed in making glass and the glass production process itself. Emissions from fuels consumed for energy purposes during the production of glass are included in the Energy sector.

Glass production employs a variety of raw materials in a glass-batch. These include formers, fluxes, stabilizers, and sometimes colorants. The major raw materials (i.e., fluxes and stabilizers) that emit process-related CO₂ emissions during the glass melting process are limestone, dolomite, and soda ash. The main former in all types of glass is silica (SiO₂). Other major formers in glass include feldspar and boric acid (i.e., borax). Fluxes are added to lower the temperature at which the batch melts. Most commonly used flux materials are soda ash (sodium carbonate, Na₂CO₃) and potash (potassium carbonate, K₂O). Stabilizers make glass more chemically stable and keep the finished glass from dissolving and/or falling apart. Commonly used stabilizing agents in glass production are limestone (CaCO₃), dolomite (CaCO₃MgCO₃), alumina (Al₂O₃), magnesia (MgO), barium carbonate (BaCO₃), strontium carbonate (SrCO₃), lithium carbonate (Li₂CO₃), and zirconia (ZrO₂) (DOE 2002). Glass makers also use a

_

¹⁸ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

certain amount of recycled scrap glass (cullet), which comes from in-house return of glassware broken in the production process or other glass spillage or retention, such as recycling or from cullet broker services.

The raw materials (primarily soda ash, limestone, and dolomite) release CO₂ emissions in a complex hightemperature chemical reaction during the glass melting process. This process is not directly comparable to the calcination process used in lime manufacturing, cement manufacturing, and process uses of carbonates (i.e., limestone/dolomite use) but has the same net effect in terms of generating process CO₂ emissions (IPCC 2006).

The U.S. glass industry can be divided into four main categories: containers, flat (window) glass, fiber glass, and specialty glass. The majority of commercial glass produced is container and flat glass (EPA 2009). The United States is one of the major global exporters of glass. Domestically, demand comes mainly from the construction, auto, bottling, and container industries. There are more than 1,700 facilities that manufacture glass in the United States, with the largest companies being Corning, Guardian Industries, Owens-Illinois, and PPG Industries. 19

The glass container sector is one of the leading soda ash consuming sectors in the United States. In 2021, glass production accounted for 48 percent of total domestic soda ash consumption (USGS 2022). Emissions from soda ash production are reported in 4.12 Soda Ash Production (CRF Source Category 2B7).

In 2021, 2,280 kilotons of soda ash, 1,397 kilotons of limestone, 893 kilotons of dolomite, and 2 kilotons of other carbonates were consumed for glass production (USGS 2022; EPA 2022). Use of soda ash, limestone, dolomite, and other carbonates in glass production resulted in aggregate CO₂ emissions of 2.0 MMT CO₂ Eq. (1,969 kt), which are summarized in Table 4-12 and Table 4-13. Overall, emissions have decreased by 13 percent compared to 1990. Emissions increased by 6 percent compared to 2020 levels.

Emissions from glass production have remained relatively consistent over the time series with some fluctuations since 1990. In general, these fluctuations were related to the behavior of the export market and the U.S. economy. Specifically, the extended downturn in residential and commercial construction and automotive industries between 2008 and 2010 resulted in reduced consumption of glass products, causing a drop in global demand for limestone/dolomite and soda ash and resulting in lower emissions. Some commercial food and beverage package manufacturers are shifting from glass containers towards lighter and more cost-effective polyethylene terephthalate (PET) based containers, putting downward pressure on domestic consumption of soda ash (USGS 1995 through 2015b). Glass production in 2021 was steady, changing by no more than 5 percent over the course of the year (Federal Reserve 2022).

Table 4-12: CO₂ Emissions from Glass Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0

Table 4-13: CO₂ Emissions from Glass Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Glass Production	1,928	2,402	1,984	1,989	1,940	1,858	1,969

Methodology and Time-Series Consistency

Carbon dioxide emissions were calculated based on the 2006 IPCC Guidelines Tier 3 method by multiplying the quantity of input carbonates (limestone, dolomite, soda ash, and other carbonates) by the carbonate-based emission factor (in metric tons CO₂/metric ton carbonate) and the average carbonate-based mineral mass fraction.

 $^{^{19}}$ Excerpt from Glass & Glass Product Manufacturing Industry Profile, First Research. Available online at: http://www.firstresearch.com/Industry-Research/Glass-and-Glass-Product-Manufacturing.html.

2010 through 2021

For this Inventory, the methodology for estimating CO₂ emissions from glass production for years 2010 through 2021 has added new activity data reported to the U.S. EPA Greenhouse Gas Reporting Program (GHGRP) on the quantities of a group of other carbonates (i.e., barium carbonate, potassium carbonate, lithium carbonate, and strontium carbonate) used for glass production (EPA 2022). The methodology continues to use the quantities of limestone and dolomite used for glass production obtained from GHGRP (EPA 2022). USGS data on the quantity of soda ash used for glass production continues to be used because it was obtained directly from the soda ash producers and includes use by smaller artisanal glass operations, which are excluded in the GHGRP data.

GHGRP collects data from glass production facilities with greenhouse gas emissions greater than 25,000 metric tons CO_2 Eq. The reporting threshold is used to exclude artisanal glass operations that are expected to have much lower greenhouse gas emissions than the threshold. These smaller facilities have not been accounted for yet for this portion of the time series for limestone, dolomite, or other carbonates due to limited data. Facilities report the total quantity of each type of carbonate used in glass production each year to GHGRP, with data collection starting in 2010 (EPA 2022).

Using the total quantities of each carbonate, EPA calculated the metric tons of emissions resulting from glass production by multiplying the quantity of input carbonates (i.e., limestone, dolomite, soda ash, and other carbonates) by carbonate-based emission factors in metric tons CO₂/metric ton carbonate (limestone, 0.43971; dolomite, 0.47732; soda ash, 0.41492; and other carbonates, 0.262), and by the average carbonate-based mineral mass fraction for each year. IPCC default values were used for limestone, dolomite, and soda ash emission factors, and the emission factor for other carbonates is based on expert judgment (Icenhour 2022). The average carbonate-based mineral mass fractions from the GHGRP, averaged across 2010 through 2014, indicate that soda ash contained 98.7 percent sodium carbonate (Na₂CO₃). This averaged value is used to estimate emissions for 1990 through 2009, described below. The previous methodology assumed that soda ash contained 100 percent sodium carbonate (Na₂CO₃). The years 2010 to 2014 were used to determine the average carbonate-based mineral mass fractions because that period was deemed to better represent historic glass production from 1990 to 2009.

1990 through 2009

Data from GHGRP on the quantity of limestone, dolomite, and other carbonates used in glass production are not available for 1990 through 2009. Additionally, USGS does not collect data on the quantity of other carbonates used for glass production.

To address time-series consistency, total emissions from 1990 to 2009 were calculated using the Federal Reserve Industrial Production Index for glass production in the United States as a surrogate for the total quantity of carbonates used in glass production. The production index measures real output expressed as a percentage of real output in a base year, which is currently 2017 (Federal Reserve 2021). Since January 1971, the Federal Reserve has released the monthly glass production index for NAICS code 3272 (Glass and Glass Product Manufacturing) as part of release G.17, "Industrial Production and Capacity Utilization" (Federal Reserve 2022). The monthly index values for each year were averaged to calculate an average annual glass production index value. Total annual process emissions were calculated by taking a ratio of the average annual glass production index for each year to the average annual glass production index for base year 2017, and multiplying by the calculated 2017 emissions (process-related) based on GHGRP data.

Emissions from limestone, dolomite, and other carbonate consumption were disaggregated from total annual emissions, using the average percent contribution of each to annual emissions from these three carbonates for 2010 through 2014 based on GHGRP data: 64.5 percent limestone, 35.5 percent dolomite, and 0.1 percent other carbonates.

The methodology for estimating CO₂ emissions from the use of soda ash for glass production and data sources for the amount of soda ash used in glass production are consistent with the methodology used for 2010 through 2021. Because data on the average mineral mass fraction for soda ash is only available starting in 2010, the values for 2010 through 2014 are averaged, as described above, and used to calculate emissions for 1990 to 2009.

Data on soda ash used for glass production for 1990 through 2021 were obtained from the U.S. Bureau of Mines (1991 and 1993a), the USGS Minerals Yearbook: Soda Ash (USGS 1995 through 2015b), and USGS Mineral Industry Surveys for Soda Ash (USGS 2017 through 2021). Data on limestone, dolomite, and other carbonates used for glass production and on average carbonate-based mineral mass fraction for 2010 through 2021 were obtained from GHGRP (EPA 2022). The quantities of limestone, dolomite, and other carbonates were calculated for 1990 through 2009 using the Federal Reserve Industrial Production Index (Federal Reserve 2022).

The amount of limestone, dolomite, soda ash, and other carbonates used in glass production each year and the annual average Federal Reserve production indices for glass production are shown in Table 4-14.

Table 4-14: Limestone, Dolomite, Soda Ash, and Other Carbonates Used in Glass Production (kt) and Average Annual Production Index for Glass and Glass Product Manufacturing

Activity	1990	2005	2017	2018	2019	2020	2021
Limestone	1,409	1,690	1,488	1,442	1,370	1,334	1,397
Dolomite	714	857	806	871	883	824	893
Soda Ash	3,177	3,050	2,360	2,280	2,220	2,130	2,280
Other Carbonates	2	3	2	2	2	2	2
Total	5,302	5,599	4,656	4,596	4,475	4,289	4,572
Production Indexa	94.3	113.1	100	102.5	99.8	93.2	93.7

^a Average Annual Production Index uses 2017 as the base year.

Note: Totals may not sum due to independent rounding.

As discussed above, methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare USGS and GHGRP data sets for 2010 through 2021. To address the inconsistencies, adjustments were made as described above.

Uncertainty

The methodology in this Inventory report uses GHGRP data for the average mass fraction of each mineral used in glass production. These minerals are limestone, dolomite, soda ash, and other carbonates (barium carbonate (BaCO₃), potassium carbonate (K₂CO₃), lithium carbonate (Li₂CO₃), and strontium carbonate (SrCO₃)). The mass fractions are reported directly by the glass manufacturers, for each year from 2010 to 2021.

The methodology uses the quantities of limestone, dolomite, and other carbonates used in glass manufacturing which is reported directly by the glass manufacturers for years 2010 through 2021 and the amount of soda ash used in glass manufacturing which is reported by soda ash producers for the full time series. EPA assigned an uncertainty range of ±5 percent for all carbonate quantities and the Federal Reserve Industrial Production Index for glass production, and using this suggested uncertainty provided in Section 2.4.2.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty range of ±2 percent for the carbonate emission factors, ±2 percent for the mineral mass fractions, and ±1 percent for the calcination fraction, and using this suggested uncertainty provided in Section 2.4.2.1 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-15. In 2021, glass production CO₂ emissions were estimated to be between 1.9 and 2.0 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 3 percent below and 3 percent above the emission estimate of 2.0 MMT CO₂ Eq.

Table 4-15: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Glass **Production (MMT CO₂ Eq. and Percent)**

Source Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a
	_	

		(MMT CO ₂ Eq.)	(MMT (CO ₂ Eq.)	(%	6)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Glass Production	CO ₂	2.0	1.9	2.0	-3%	+3%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details). For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). ²⁰ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

For the current Inventory, refinements to the methodology were implemented, using more complete activity data from GHGRP for 2010 through 2021 and the industrial production index for glass and glass product manufacturing from the Federal Reserve for 1990 through 2009 to address time-series consistency. These refinements are described under the Methodology and Time-Series Consistency section. The revised values for 1990 through 2020 resulted in decreased emissions estimates prior to 2018 and slight increases for 2019 and 2020. Across the time series, emissions decreased by an average of 1.0 percent compared to the previous Inventory. Annual emission changes during the time series ranged from a 0.1 percent increase in 2019 and 2020 (1 kt CO₂) to a 1.4 percent decrease in 1999 (27 kt CO₂).

Planned Improvements

EPA plans to evaluate updates to uncertainty levels for the activity data and mineral mass fraction values from EPA's GHGRP. This is a near-term planned improvement.

Some glass producing facilities in the United States do not report to EPA's GHGRP because they fall below the reporting threshold for this industry. EPA will continue ongoing research on the availability of data to better assess the completeness of emission estimates from glass production and how to refine the methodology to ensure complete national coverage of this category. When reporting began in 2010, EPA received data from more facilities that were above the reporting threshold than expected, and total emissions were higher than expected for all glass production facilities in the United States (EPA 2009). Research will include reassessing previous assessments of GHGRP industry coverage using the reporting threshold of 25,000 metric tons CO₂ Eq. This is a medium-term planned improvement.

²⁰ GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp-verification-factsheet.pdf.

Other Process Uses of Carbonates (CRF **Source Category 2A4)**

Limestone (CaCO₃), dolomite (CaCO₃MgCO₃), ²¹ and other carbonates such as soda ash, magnesite, and siderite are basic materials used by a wide variety of industries, including construction, agriculture, chemical, metallurgy, glass production, and environmental pollution control. This section addresses only limestone, dolomite, and soda ash use. For industrial applications, carbonates such as limestone and dolomite are heated sufficiently enough to calcine the material and generate CO₂ as a byproduct.

$$CaCO_3 \rightarrow CaO + CO_2$$

 $MgCO_3 \rightarrow MgO + CO_2$

Examples of such applications include limestone used as a flux or purifier in metallurgical furnaces, as a sorbent in flue gas desulfurization (FGD) systems for utility and industrial plants, and as a raw material for the production of glass, lime, and cement. Emissions from limestone and dolomite used in the production of cement, lime, glass, and iron and steel are excluded from the Other Process Uses of Carbonates category and reported under their respective source categories (e.g., Section 4.3, Glass Production). Emissions from soda ash production are reported under Section 4.12, Soda Ash Production (CRF Source Category 2B7). Emissions from soda ash consumption associated with glass manufacturing are reported under Section 4.3, Glass Production (CRF Source Category 2A3). Emissions from the use of limestone and dolomite in liming of agricultural soils are included in the Agriculture chapter under Section 5.5, Liming (CRF Source Category 3G). Emissions from fuels consumed for energy purposes during these processes are accounted for in the Energy chapter under Section 3.1, Fossil Fuel Combustion (CRF Source Category 1A). Both lime (CaO) and limestone (CaCO₃) can be used as a sorbent for FGD systems. Emissions from lime consumption for FGD systems and from sugar refining are reported under Section 4.3 Lime Production (CRF Source Category 2A2). Emissions from the use of dolomite in primary magnesium metal production are reported under Section 4.20, Magnesium Production and Processing (CRF Source Category 2C4).

Limestone and dolomite are widely distributed throughout the world in deposits of varying sizes and degrees of purity. Large deposits of limestone occur in nearly every state in the United States, and significant quantities are extracted for industrial applications. In 2018, the leading limestone producing states were Texas, Florida, Ohio, Missouri, and Pennsylvania, which contributed 46 percent of the total U.S. output (USGS 2022a). Dolomite deposits are found in the United States, Canada, Mexico, Europe, Africa, and Brazil. In the United States, the leading dolomite producing states are Pennsylvania, New York, and Utah which currently contribute more than a third of the total U.S. output (USGS 2022a). Internationally, two types of soda ash are produced: natural and synthetic. In 2019, 93 percent of the global soda ash production came from China, the United States, Russia, Germany, India, Turkey, Poland, and France. The United States only produces natural soda ash and only in two states: Wyoming and California (USGS 2021c).

In 2021, 12,789 kilotons (kt) of limestone, 2,826 kt of dolomite, and 2,360 kt of soda ash were consumed for these emissive applications, which excludes consumption for the production of cement, lime, glass, and iron and steel (Willett 2022, USGS 2022b). Usage of limestone, dolomite and soda ash resulted in aggregate CO₂ emissions of 8.0 MMT CO₂ Eq. (7,951 kt) (see Table 4-16 and Table 4-17). The 2021 emissions decreased 5 percent compared to 2020, primarily as a result of decreased limestone consumption attributed to flux stone. Growth in the public and private construction markets contributed to an increase in consumption of crushed stone in 2021. Overall emissions have increased 29 percent from 1990 through 2021.

²¹ Limestone and dolomite are collectively referred to as limestone by the industry, and intermediate varieties are seldom distinguished.

Table 4-16: CO₂ Emissions from Other Process Uses of Carbonates (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Flux Stone	2.6	2.6	2.4	2.8	2.9	3.4	2.8
FGD	1.4	3.0	5.6	2.2	3.2	3.0	3.1
Soda Ash Consumptiona	1.4	1.3	1.1	1.1	1.0	1.0	1.0
Other Miscellaneous Uses ^b	0.8	0.5	0.8	1.3	1.2	1.0	1.0
Total	6.2	7.5	9.9	7.4	8.4	8.4	8.0

^a Soda ash consumption not associated with glass manufacturing.

Note: Totals may not sum due to independent rounding.

Table 4-17: CO₂ Emissions from Other Process Uses of Carbonates (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Flux Stone	2,592	2,649	2,441	2,795	2,936	3,450	2,799
FGD	1,432	2,973	5,598	2,229	3,202	2,997	3,135
Soda Ash Consumption ^a	1,390	1,305	1,058	1,069	1,036	958	979
Other Miscellaneous Uses ^b	819	533	771	1,259	1,248	994	1,038
Total	6,233	7,459	9,869	7,351	8,422	8,399	7,951

^a Soda ash consumption not associated with glass manufacturing.

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

Carbon dioxide emissions from limestone and dolomite consumption were calculated based on the *2006 IPCC Guidelines* Tier 2 method by multiplying the quantity of limestone or dolomite consumed by the emission factor for limestone or dolomite calcination, respectively: 0.43971 metric ton CO₂/metric ton carbonate for limestone and 0.47732 metric ton CO₂/metric ton carbonate for dolomite. ²² This methodology was used for flux stone, flue gas desulfurization systems, chemical stone, mine dusting or acid water treatment, and acid neutralization. Flux stone used during the production of iron and steel was deducted from the Other Process Uses of Carbonates source category estimate and attributed to the Iron and Steel Production source category estimate. Similarly, limestone and dolomite consumption for glass manufacturing, cement, and lime manufacturing are excluded from this category and attributed to their respective categories.

Consumption data for 1990 through 2021 of limestone and dolomite used for flux stone, flue gas desulfurization systems, chemical stone, mine dusting or acid water treatment, and acid neutralization (see Table 4-18) were obtained from the U.S. Geological Survey (USGS) *Minerals Yearbook: Crushed Stone Annual Report* (1995a through 2022), preliminary data for 2021 from USGS Crushed Stone Commodity Expert (Willett 2022), American Iron and Steel Institute limestone and dolomite consumption data (AISI 2018 through 2021), and the U.S. Bureau of Mines (1991 and 1993a), which are reported to the nearest ton. In addition, the estimated values for limestone and dolomite consumption for flux stone used during the production of iron and steel were adjusted using emissions data from the EPA's Greenhouse Gas Reporting Program (GHGRP) subpart Q for the iron and steel sector to account for the impacts of the COVID-19 pandemic in 2020 and 2021. Iron and steel GHGRP process emissions data increased by approximately 12 percent from 2020 to 2021 (EPA 2022). This adjustment method is consistent with the method used in Section 4.17 Iron and Steel Production (CRF Source Category 2C1) and Metallurgical Coke Production.

4-26 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

^b "Other miscellaneous uses" include chemical stone, mine dusting or acid water treatment, and acid neutralization.

^b "Other miscellaneous uses" include chemical stone, mine dusting or acid water treatment, and acid neutralization.

²² 2006 IPCC Guidelines, Volume 3: Chapter 2, Table 2.1.

During 1990 and 1992, the USGS did not conduct a detailed survey of limestone and dolomite consumption by end-use; therefore, data on consumption by end use for 1990 was estimated by applying the 1991 ratios of total limestone and dolomite consumption by end use to total 1990 limestone and dolomite consumption values. Similarly, the 1992 consumption figures were approximated by applying an average of the 1991 and 1993 ratios of total limestone and dolomite use by end uses to the 1992 total values.

In 1991, the U.S. Bureau of Mines, now known as the USGS, began compiling production and end use information through surveys of crushed stone manufacturers. Manufacturers provided different levels of detail in survey responses, so information was divided into three categories: (1) production by end-use, as reported by manufacturers (i.e., "specified" production); (2) production reported by manufacturers without end-uses specified (i.e., "unspecified-reported" production); and (3) estimated additional production by manufacturers who did not respond to the survey (i.e., "unspecified-estimated" production). Additionally, each year the USGS withholds data on certain limestone and dolomite end-uses due to confidentiality agreements regarding company proprietary data. For the purposes of this analysis, emissive end-uses that contained withheld data were estimated using one of the following techniques: (1) the value for all the withheld data points for limestone or dolomite use was distributed evenly to all withheld end-uses; (2) the average percent of total limestone or dolomite for the withheld end-use in the preceding and succeeding years; or (3) the average fraction of total limestone or dolomite for the end-use over the entire time period.

A large quantity of crushed stone was reported to the USGS under the category "unspecified uses." A portion of this consumption is believed to be limestone or dolomite used for emissive end uses. The quantity listed for "unspecified uses" was, therefore, allocated to all other reported end-uses according to each end-use's fraction of total consumption in that year.²³

Table 4-18: Limestone and Dolomite Consumption (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Flux Stone	5,842	5,745	5,447	6,242	6,551	7,592	6,124
Limestone	5,237	2,492	4,216	4,891	5,088	4,631	3,299
Dolomite	605	3,254	1,230	1,351	1,463	2,961	2,826
FGD	3,258	6,761	12,732	5,068	7,282	6,817	7,129
Other Miscellaneous Uses	1,835	1,212	1,754	2,862	2,834	2,260	2,361
Total	10,935	13,719	19,932	14,172	16,667	16,669	15,615

Note: Totals may not sum due to independent rounding.

Carbon dioxide emissions from soda ash consumption were calculated based on the 2006 IPCC Guidelines Tier 1 method. Excluding glass manufacturing which is reported under Section 4.3 Glass Production (CRF Source Category 2A3), most soda ash is consumed in chemical production, with minor amounts used in soap production, pulp and paper, flue gas desulfurization, and water treatment. As soda ash is consumed for these purposes, CO2 is usually emitted. In these applications, it is assumed that one mole of carbon is released for every mole of soda ash used. Thus, approximately 0.113 metric tons of carbon (or 0.415 metric tons of CO₂) are released for every metric ton of soda ash consumed. The activity data for soda ash consumption for 1990 to 2021 (see Table 4-19) were obtained from the U.S. Geological Survey (USGS) Minerals Yearbook for Soda Ash (1994 through 2015b) and USGS Mineral Industry Surveys for Soda Ash (USGS 2017a, 2018, 2019, 2020b, 2021d, 2022b). Soda ash consumption data were collected by the USGS from voluntary surveys of the U.S. soda ash industry.

Table 4-19: Soda Ash Consumption Not Associated with Glass Manufacturing (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Soda Asha	3,351	3,144	2,550	2,576	2,497	2,310	2,360

²³ This approach was recommended by USGS, the data collection agency.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The uncertainty levels presented in this section account for uncertainty associated with activity data. Data on limestone and dolomite consumption are collected by USGS through voluntary national surveys. USGS contacts the mines (i.e., producers of various types of crushed stone) for annual sales data. Data on other carbonate consumption are not readily available. The producers report the annual quantity sold to various end-users and industry types. USGS estimates the historical response rate for the crushed stone survey to be approximately 70 percent, and the rest is estimated by USGS. Large fluctuations in reported consumption exist, reflecting year-toyear changes in the number of survey responders. The uncertainty resulting from a shifting survey population is exacerbated by the gaps in the time series of reports. The accuracy of distribution by end use is also uncertain because this value is reported by the producer/mines and not the end user. Additionally, there is significant inherent uncertainty associated with estimating withheld data points for specific end uses of limestone and dolomite. Lastly, much of the limestone consumed in the United States is reported as "other unspecified uses;" therefore, it is difficult to accurately allocate this unspecified quantity to the correct end-uses. EPA contacted the USGS National Minerals Information Center Crushed Stone commodity expert to assess the current uncertainty ranges associated with the limestone and dolomite consumption data compiled and published by USGS. During this discussion, the expert confirmed that EPA's range of uncertainty was still reasonable (Willett 2017). EPA assigned an uncertainty range of ±10 percent for limestone and dolomite consumption, based on expert judgement (Willett 2017). EPA assigned an uncertainty range of ±5 percent for soda ash consumption, and using this suggested uncertainty provided in Volume 3, Chapter 2, Section 2.4.2.2 of the 2006 IPPC Guidelines is appropriate based on expert judgment (RTI 2023).

Uncertainty in the estimates also arises in part due to variations in the chemical composition of limestone. In addition to calcium carbonate, limestone may contain smaller amounts of magnesia, silica, and sulfur, among other minerals. The exact specifications for limestone or dolomite used as flux stone vary with the pyrometallurgical process and the kind of ore processed. EPA assigned an uncertainty range of ±3 percent for the CO₂ emission factors for limestone and dolomite consumption, and using this suggested uncertainty provided in Volume 3, Chapter 2, Section 2.5.2.1 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty provided in Volume 3, Chapter 2, Section 2.4.2.1 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

For emissions from soda ash consumption, the primary source of uncertainty results from the fact that these emissions are dependent upon the type of processing employed by each end-use. Specific emission factors for each end-use are not available, so a Tier 1 default emission factor is used for all end-uses. Therefore, there is uncertainty surrounding the emission factors from the consumption of soda ash. Additional uncertainty comes from the reported consumption and allocation of consumption within sectors that is collected on a quarterly basis by the USGS. Efforts have been made to categorize company sales within the correct end-use sector. EPA assigned an uncertainty range of ±2 percent for the CO₂ emission factor for soda ash consumption. The uncertainty range is derived from the default ranges for soda ash consumption for glass production in Volume 3, Chapter 2, Section 2.4.2.1 of the 2006 IPCC Guidelines which is representative of soda ash consumption not associated with glass production, based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-20. Carbon dioxide emissions from other process uses of carbonates in 2021 were estimated to be between 7.1 and 9.2 MMT CO₂ Eq.

^a Soda ash consumption is sales reported by producers which exclude imports. Historically, imported soda ash is less than 1 percent of the total U.S. consumption (Kostick 2012).

at the 95 percent confidence level. This indicates a range of approximately 11 percent below and 14 percent above the emission estimate of 8.0 MMT CO₂ Eq.

Table 4-20: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Other **Process Uses of Carbonates (MMT CO₂ Eq. and Percent)**

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estir						
		(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%	6)			
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Other Process Uses of Carbonates	CO ₂	8.0	7.1	9.2	-11%	+14%			

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

For the current Inventory, updated USGS data on limestone and dolomite consumption was available for 2019 and 2020, resulting in updated emissions estimates for those years. Compared to the previous Inventory, emissions for 2019 decreased by 14.7 percent (1,449 kt CO₂ Eq.) and emissions for 2020 decreased by 18.8 percent (1,843 kt CO₂ Eq.).

Planned Improvements

In response to comments received during previous Inventory reports from the UNFCCC, EPA has inquired to the availability of ceramics and non-metallurgical magnesia data. EPA is assessing potential activity data from USGS that spans the full time series for ceramics production. Data on non-metallurgical magnesia is not currently reported by survey respondents to USGS, and EPA continues to conduct outreach with other entities. This improvement remains ongoing, and EPA plans to continue to update this Planned Improvements section in future reports as more information becomes available.

EPA also plans to review the uncertainty ranges assigned to activity data. This planned improvement is currently planned as a medium-term improvement.

Ammonia Production (CRF Source Category 2B1)

Emissions of carbon dioxide (CO₂) occur during the production of synthetic ammonia (NH₃), primarily through the use of natural gas, petroleum coke, or naphtha as a feedstock. The natural gas-, naphtha-, and petroleum cokebased processes produce CO₂ and hydrogen (H₂), the latter of which is used in the production of ammonia. The brine electrolysis process for production of ammonia does not lead to process-based CO2 emissions. Due to

national circumstances, emissions from fuels consumed for energy purposes during the production of ammonia are accounted for in the Energy chapter. More information on this approach can be found in the Methodology section below.

Ammonia production requires a source of nitrogen (N) and hydrogen (H). Nitrogen is obtained from air through liquid air distillation or an oxidative process where air is burnt and the residual nitrogen is recovered. In the United States, the majority of ammonia is produced using a natural gas feedstock as the hydrogen source. One synthetic ammonia production plant located in Kansas is producing ammonia from petroleum coke feedstock. In some U.S. plants, some of the CO₂ produced by the process is captured and used to produce urea rather than being emitted to the atmosphere. In 2021, 16 companies operated 35 ammonia producing facilities in 16 states. Approximately 60 percent of domestic ammonia production capacity is concentrated in Louisiana, Oklahoma, and Texas (USGS 2022).

Synthetic ammonia production from natural gas feedstock consists of five principal process steps. The primary reforming step converts methane (CH₄) to CO₂, carbon monoxide (CO), and hydrogen (H₂) in the presence of a catalyst. Only 30 to 40 percent of the CH₄ feedstock to the primary reformer is converted to CO and CO₂ in this step of the process. The secondary reforming step converts the remaining CH₄ feedstock to CO and CO₂. In the shift conversion step, the CO in the process gas from the secondary reforming step (representing approximately 15 percent of the process gas) is converted to CO₂ in the presence of a catalyst, water, and air. Carbon dioxide is removed from the process gas by the shift conversion process, and the H₂ is combined with the nitrogen (N₂) gas in the process gas during the ammonia synthesis step to produce ammonia. The CO₂ is included in a waste gas stream with other process impurities and is absorbed by a scrubber solution. In regenerating the scrubber solution, CO₂ is released from the solution.

The conversion process for conventional steam reforming of CH₄, including the primary and secondary reforming and the shift conversion processes, is approximately as follows:

$$0.88CH_4 + 1.26Air + 1.24H_2O \rightarrow 0.88CO_2 + N_2 + 3H_2$$

 $N_2 + 3H_2 \rightarrow 2NH_3$

To produce synthetic ammonia from petroleum coke, the petroleum coke is gasified and converted to CO_2 and H_2 . These gases are separated, and the H_2 is used as a feedstock to the ammonia production process, where it is reacted with N_2 to form ammonia.

Not all of the CO_2 produced during the production of ammonia is emitted directly to the atmosphere. Some of the ammonia and some of the CO_2 produced by the synthetic ammonia process are used as raw materials in the production of urea $[CO(NH_2)_2]$, which has a variety of agricultural and industrial applications.

The chemical reaction that produces urea is:

$$2NH_3 + CO_2 \rightarrow NH_2COONH_4 \rightarrow CO(NH_2)_2 + H_2O$$

Only the CO_2 emitted directly to the atmosphere from the synthetic ammonia production process is accounted for in determining emissions from ammonia production. The CO_2 that is captured during the ammonia production process and used to produce urea does not contribute to the CO_2 emission estimates for ammonia production presented in this section. Instead, CO_2 emissions resulting from the consumption of urea are attributed to the urea consumption or urea application source category (under the assumption that the carbon stored in the urea during its manufacture is released into the environment during its consumption or application). Emissions of CO_2 resulting from agricultural applications of urea are accounted for in Section 5.6 Urea Fertilization (CRF Source Category 3H) of the Agriculture chapter. Emissions of CO_2 resulting from non-agricultural applications of urea (e.g., use as a feedstock in chemical production processes) are accounted for in Section 4.6 Urea Consumption for Non-Agricultural Purposes of this chapter.

Emissions from fuel used for energy at ammonia plants are accounted for in the Energy chapter. The consumption of natural gas and petroleum coke as fossil fuel feedstocks for NH₃ production are adjusted for within the Energy

chapter as these fuels were consumed during non-energy related activities. More information on this methodology is described in Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

Total emissions of CO₂ from ammonia production in 2021 were 12.2 MMT CO₂ Eq. (12,207 kt) and are summarized in Table 4-21 and Table 4-22. Ammonia production relies on natural gas as both a feedstock and a fuel, and as such, market fluctuations and volatility in natural gas prices affect the production of ammonia. Since 1990, emissions from ammonia production have decreased by about 15 percent. Emissions in 2021 decreased by about 6 percent from the 2020 levels. One facility in Kansas produces ammonia from petroleum coke and began operations in 2000. All other facilities use natural gas as feedstock.

Emissions from ammonia production increased steadily from 2015 to 2018, due to the addition of new ammonia production facilities and new production units at existing facilities in 2016, 2017, and 2018. Agriculture continues to drive demand for nitrogen fertilizers, accounting for approximately 88 percent of domestic ammonia consumption.

Table 4-21: CO₂ Emissions from Ammonia Production (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2

Table 4-22: CO₂ Emissions from Ammonia Production (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Ammonia Production	14,404	10,234	12,481	12,669	12,401	13,006	12,207

Methodology and Time-Series Consistency

Estimates of CO₂ emissions from the production of synthetic ammonia utilize a country-specific approach consistent with Tier 3 methods in the 2006 IPCC Guidelines (IPCC 2006). This Inventory report includes methodological refinements for 2010 to 2021 that directly use the process CO₂ emissions reported to subpart G of the U.S. EPA Greenhouse Gas Reporting Program (GHGRP) (EPA 2022). The GHGRP data includes facilities using natural gas and petroleum coke as feedstock. Refinements for 1990 to 2009 emissions are based on reported and calculated data on natural gas and petroleum coke feedstock used for ammonia production, consistent with IPCC Tier 2 methods.

Emissions from fuel used for energy at ammonia plants are accounted for in the Energy chapter. This approach differs slightly from the 2006 IPCC Guidelines which indicates that "in the case of ammonia production no distinction is made between fuel and feedstock emissions with all emissions accounted for in the IPPU Sector." Disaggregated data on fuel used for ammonia feedstock and fuel used for energy for ammonia production are not available in the United States. The Energy Information Administration (EIA), where energy use data are obtained for the Inventory (see the Energy chapter), does not provide data broken out by industrial category. EIA data are only available at the broad industry sector level. Furthermore, the GHGRP data used to estimate emissions are based on feedstock use and not fuel use.

Natural Gas Feedstock

For 2017 through 2021, facilities directly reported to GHGRP the quantity of natural gas feedstock used for ammonia production along with the carbon content of the natural gas feedstock (EPA 2022). For 2010 through 2016, the quantity of natural gas feedstock was calculated using GHGRP CO₂ emissions for 2010 through 2016, average molecular weight of the feedstock from 2017 through 2021, and average carbon content from 2017 through 2021.

For 1990 to 2009, the quantity of natural gas feedstock was not available and was estimated by multiplying the average ratio of natural gas feedstock quantity to ammonia production quantity from 2010 through 2014 by total ammonia production for each year for 1990 to 2009 (ACC 2021). The years 2010 to 2014 were used to determine the average ratio of natural gas feedstock quantity to ammonia production because that period better represents historic ammonia production from 1990 to 2009. ²⁴ CO₂ emissions from the production of synthetic ammonia from natural gas feedstock for 1990 to 2009 were estimated using the natural gas feedstock quantity as determined above and the Inventory CO₂ emissions factor and heating content value for natural gas (consistent with values used in the Energy chapter).

Petroleum Coke Feedstock

Since 2000, one facility in the United States has produced ammonia using petroleum coke as a feedstock. For 2006 to 2021, CO₂ emissions from the production of synthetic ammonia from petroleum coke feedstock were estimated by multiplying the following: quantity of petroleum coke feedstock reported by the facility (CVR 2008 through 2021); the Inventory heating content value for petroleum coke (consistent with values used in the Energy chapter); the petroleum coke carbon content; and a stoichiometric CO_2/C factor of 44/12.

For 2000 to 2005, the quantity of petroleum coke feedstock was not available and was estimated by multiplying the average ratio of petroleum coke feedstock quantity to ammonia production quantity produced from petroleum coke from 2006 through 2010 by total ammonia production for 2000 to 2005 (ACC 2021). The years 2006 to 2010 were used to determine the average ratio of petroleum coke feedstock quantity to the ammonia quantity produced from petroleum coke because that period was deemed to better represent historic ammonia production from petroleum coke for the period from 2000 to 2005.

Urea Production Adjustments

Emissions of CO₂ from ammonia production from both feedstocks and for all years from 1990 to 2021 were adjusted to account for the use of some CO₂ emissions from ammonia production as a raw material in the production of urea. The CO₂ emissions reported for ammonia production are reduced by a factor of 0.733, which corresponds to a stoichiometric CO₂/urea factor of 44/60, assuming complete conversion of ammonia (NH₃) and CO₂ to urea (IPCC 2006; EFMA 2000), and multiplied by total annual domestic urea production.

All synthetic ammonia production and subsequent urea production are assumed to be from the same process conventional catalytic reforming of natural gas feedstock, with the exception of ammonia production from petroleum coke feedstock at the one plant located in Kansas.

Table 4-23: Total Ammonia Production, Total Urea Production, and Recovered CO2 **Consumed for Urea Production (kt)**

Year	1990		2005	2017	2018	2019	2020	2021
Total Ammonia Production	15,425	10	0,143	14,070	16,010	16,410	17,020	15,420
Total Urea Production	7,450	į	5,270	9,030	10,700	11,400	11,500	10,500
Recovered CO ₂ Consumed for								
Urea Production	5,463	3	3,865	6,622	7,847	8,360	8,433	7,700

Total ammonia production, total urea production, and recovered CO₂ consumed for urea production are shown in Table 4-23. Total ammonia production data for 2011 through 2021 were obtained from American Chemistry Council (ACC 2021). For years before 2011, ammonia production data were obtained from the Census Bureau of

²⁴ The number of facilities reporting to GHGRP has increased since 2010: 22 facilities reported from 2010 to 2012; 23 from 2013 to 2015; 26 in 2016; 28 in 2017 and 29 from 2018 to 2021. Using data from 2010 to 2014 excludes the newer facilities that might not be representative of facilities in earlier years.

the U.S. Department of Commerce (U.S. Census Bureau 1991 through 1994, 1998 through 2011) as reported in Current Industrial Reports Fertilizer Materials and Related Products annual and quarterly reports. Data on facilitylevel process emissions for 2010 through 2021 on natural gas feedstock used and carbon content of the natural gas feedstock starting in 2017 were obtained from GHGRP (EPA 2022). Natural gas and petroleum coke heating values come from national-level data (EIA 2023), and natural gas and petroleum coke carbon contents are the same as used in the Energy chapter calculations.

Data on urea production for 2010 through 2021 were obtained from GHGRP (EPA 2022). Urea production data for 2009 through 2010 were obtained from the U.S. Census Bureau (U.S. Census Bureau 2010 and 2011). Urea production data for 1990 through 2008 were obtained from the USGS Minerals Yearbook: Nitrogen (USGS 1994-2009). The U.S. Census Bureau ceased collection of urea production statistics in 2011.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for ammonia production spliced activity data from different sources: U. S. Census Bureau data for 1990 through 2010, ACC data beginning in 2011, and GHGRP data beginning in 2010 and 2017. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

The uncertainties presented in this section are primarily due to how accurately the emission factor used represents an average across all ammonia plants using natural gas feedstock. Uncertainty in the back calculation of natural gas feedstock used for 1990 through 2009 also exists. Using the average ratio of natural gas feedstock quantity to ammonia production, determined using GHGRP data from 2010 to 2014, does not account for efficiency gains in ammonia production since 1990 (e.g., potential decreases in gas usage per ton of ammonia, manufacturing shift from steam-driven turbines to electrical-drive turbines). Uncertainties are also associated with ammonia production estimates and the assumption that all ammonia production and subsequent urea production was from the same process—conventional catalytic reforming of natural gas feedstock, with the exception of one ammonia production plant located in Kansas that is manufacturing ammonia from petroleum coke feedstock. Uncertainty is also associated with the representativeness of the emission factor used for the petroleum coke-based ammonia process. It is also assumed that ammonia and urea are produced at co-located plants from the same natural gas raw material. The uncertainty of the total urea production activity data, based on USGS Minerals Yearbook: Nitrogen data, is a function of the reliability of reported production data and is influenced by the completeness of the survey responses. EPA assigned an uncertainty range of ±5 percent for ammonia production and a range of ±2 percent for urea production, natural gas feedstock quantity, petroleum coke feedstock quantity, and carbon content of natural gas feedstock, and using these suggested uncertainty provided in Section 3.2.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

Recovery of CO₂ from ammonia production plants for purposes other than urea production (e.g., commercial sale, etc.) has not been considered in estimating the CO₂ emissions from ammonia production, as data concerning the disposition of recovered CO2 are not available. Such recovery may or may not affect the overall estimate of CO2 emissions depending upon the end use to which the recovered CO₂ is applied. Further research is required to determine whether byproduct CO₂ is being recovered from other ammonia production plants for application to end uses that are not accounted for elsewhere; however, for reporting purposes, CO2 consumption for urea production is provided in this chapter.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-24. Carbon dioxide emissions from ammonia production in 2021 were estimated to be between 11.8 and 12.6 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 4 percent below and 4 percent above the emission estimate of 12.2 MMT CO₂ Eq.

Table 4-24: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Ammonia Production (MMT CO₂ Eq. and Percent)

Course	Coo	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a					
Source	urce Gas (MMT	(MMT CO ₂ Eq.)	(MMT C	O ₂ Eq.)		(%)		
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Ammonia Production	CO ₂	12.2	11.8	12.6	-4%	+4%		

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied to ammonia production emission estimates consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details). More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to ammonia facilities can be found under Subpart G (Ammonia Production) of the regulation (40 CFR Part 98). ²⁵ EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. ²⁶ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

As part of the QA/QC process, the calculated natural gas feedstock use data were compared with other natural gas feedstock data sources, including:

- The stoichiometric value of natural gas needed to produce the assumed amount of ammonia produced (0.414 kg CH₄ / kg NH₃) converted to C and then converted to standard cubic feet (scf) based on the C emissions factors and heating content values used in the Inventory.
- Non-fuel use of natural gas in ammonia production for NAICS code 325311 Nitrogenous Fertilizers from EIA Manufacturing Energy Consumption Survey (MECS). Data are only available for some years as the survey is only done every 4 years and some years are withheld for confidentiality reasons. The EIA MECS data are limited in coverage and for some years is below the stoichiometric quantity of feedstock needed. Differences over time could be due to coverage of the survey data
- Facility-reported data for 2017 through 2021 under subpart G of the GHGRP for feedstock use (in scf).
- Data derived from the GHGRP reported CO₂ emissions for 2010 through 2016, converted to scf based on average GHGRP reported values for C content and calculated molecular weights.

The current Inventory data are consistent with trends in the production data because the Inventory results are based on the assumed CO_2 emissions factor which is linked to production. It implies that some natural gas feedstock is used beyond the stoichiometric amount needed due to losses/efficiencies, etc.

More details on the greenhouse gas calculation, monitoring, and QA/QC methods applicable to reporting of urea produced at ammonia production facilities can be found under Section 4.6 Urea Consumption for Non-Agricultural Purposes.

²⁵ See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98 main 02.tpl.

²⁶ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Recalculations

Based on the updated methodology, recalculations were performed for emissions from ammonia for years 1990 through 2020. Compared to the previous *Inventory*, total CO₂ emissions from ammonia production (from natural gas and petroleum coke feedstocks) increased by an average of 8.7 percent (961 kt CO₂) per year, ranging from a decrease of 4.8 percent (507 kt CO₂) in 2015 to an increase of 13.3 percent (1,203 kt CO₂) in 2007.

Planned Improvements

Currently the Inventory does not separately track fuel energy use for ammonia production. To be more consistent with 2006 IPCC Guidelines, EPA is considering whether to include natural gas fuel use as part of ammonia production emissions as a future improvement. The data are still being evaluated as part of EPA's efforts to disaggregate other industrial sector categories' energy use in the Energy chapter of the Inventory. If possible, this will be incorporated in future Inventory reports. If incorporated, the fuel energy use and emissions will be removed from current reporting under Energy to avoid double counting.

Urea Consumption for Non-Agricultural 4.6 **Purposes**

Urea is produced using ammonia (NH₃) and carbon dioxide (CO₂) as raw materials. All urea produced in the United States is assumed to be produced at ammonia production facilities where both ammonia and CO₂ are generated. There were 35 plants producing ammonia in the United States in 2021, with two additional plants sitting idle for the entire year (USGS 2022b).

The chemical reaction that produces urea is:

$$2NH_3 + CO_2 \rightarrow NH_2COONH_4 \rightarrow CO(NH_2)_2 + H_2O$$

This section accounts for CO₂ emissions associated with urea consumed exclusively for non-agricultural purposes. Emissions of CO₂ resulting from agricultural applications of urea are accounted for in Section 5.6 Urea Fertilization (CRF Source Category 3H) of the Agriculture chapter.

The industrial applications of urea include its use in adhesives, binders, sealants, resins, fillers, analytical reagents, catalysts, intermediates, solvents, dyestuffs, fragrances, deodorizers, flavoring agents, humectants and dehydrating agents, formulation components, monomers, paint and coating additives, photosensitive agents, and surface treatments agents. In addition, urea is used for abating nitrogen oxide (NO_x) emissions from coal-fired power plants and diesel transportation motors.

Emissions of CO₂ from urea consumed for non-agricultural purposes in 2021 were estimated to be 5.0 MMT CO₂ Eq. (4,989 kt) and are summarized in Table 4-25 and Table 4-26. Net CO₂ emissions from urea consumption for non-agricultural purposes have increased by approximately 32 percent from 1990 to 2021 and decreased by approximately 14.0 percent from 2020 to 2021.

Table 4-25: CO₂ Emissions from Urea Consumption for Non-Agricultural Purposes (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Consumption	3.8	3.7	5.2	6.1	6.2	5.8	5.0

Table 4-26: CO₂ Emissions from Urea Consumption for Non-Agricultural Purposes (kt CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Consumption	3,784	3,653	5,161	6,111	6,154	5,814	4,989

Methodology and Time-Series Consistency

Emissions of CO_2 resulting from urea consumption for non-agricultural purposes are estimated by multiplying the amount of urea consumed in the United States for non-agricultural purposes by a factor representing the amount of CO_2 used as a raw material to produce the urea. This method is based on the assumption that all of the carbon in urea is released into the environment as CO_2 during use, consistent with the Tier 1 method used to estimate emissions from ammonia production in the 2006 IPCC Guidelines (IPCC 2006) which states that the " CO_2 recovered [from ammonia production] for downstream use can be estimated from the quantity of urea produced where CO_2 is estimated by multiplying urea production by 44/60, the stoichiometric ratio of CO_2 to urea."

The amount of urea consumed for non-agricultural purposes in the United States is estimated by deducting the quantity of urea fertilizer applied to agricultural lands, which is obtained directly from the Agriculture chapter (see Table 5-25), from the total domestic supply of urea as reported in Table 4-27. The domestic supply of urea is estimated based on the amount of urea produced plus urea imports and minus urea exports. A factor of 0.733 tons of CO_2 per ton of urea consumed is then applied to the resulting supply of urea for non-agricultural purposes to estimate CO_2 emissions from the amount of urea consumed for non-agricultural purposes. The 0.733 tons of CO_2 per ton of urea emission factor is based on the stoichiometry of carbon in urea. This corresponds to a stoichiometric ratio of CO_2 to urea of 44/60, assuming complete conversion of carbon in urea to CO_2 (IPCC 2006; EFMA 2000).

Urea production data for 1990 through 2008 were obtained from the U.S. Geological Survey (USGS) *Minerals Yearbook: Nitrogen* (USGS 1994 through 2009a). Urea production data for 2009 through 2010 were obtained from the U.S. Census Bureau (2011). The U.S. Census Bureau ceased collection of urea production statistics in 2011. Urea production data for 2011 through 2021 were obtained from GHGRP(EPA 2018; EPA 2022a; EPA 2022b).

Urea import data for 2021 were not available at the time of publication and were estimated using 2020 values. Urea import data for 2013 to 2020 were obtained from the USGS *Minerals Yearbook: Nitrogen* (USGS 2021a). Urea import data for 2011 and 2012 were taken from *U.S. Fertilizer Import/Exports* from the United States Department of Agriculture (USDA) Economic Research Service Data Sets (U.S. Department of Agriculture 2012). USDA suspended updates to this data after 2012. Urea import data for the previous years were obtained from the U.S. Census Bureau *Current Industrial Reports Fertilizer Materials and Related Products* annual and quarterly reports for 1997 through 2010 (U.S. Census Bureau 2001 through 2011), The Fertilizer Institute (TFI 2002) for 1993 through 1996, and the United States International Trade Commission Interactive Tariff and Trade DataWeb (U.S. ITC 2002) for 1990 through 1992 (see Table 4-27).

Urea export data for 2021 were not available at the time of publication and were estimated using 2020 values. Urea export data for 2013 to 2020 were obtained from the USGS *Minerals Yearbook: Nitrogen* (USGS 2021a). Urea export data for 1990 through 2012 were taken from *U.S. Fertilizer Import/Exports* from USDA Economic Research Service Data Sets (U.S. Department of Agriculture 2012). USDA suspended updates to this data after 2012.

Table 4-27: Urea Production, Urea Applied as Fertilizer, Urea Imports, and Urea Exports (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Urea Production	7,450	5,270	9,030	10,700	11,400	11,500	10,500
Urea Applied as Fertilizer	3,296	4,779	6,630	6,734	6,859	6,984	7,109
Urea Imports	1,860	5,026	5,510	5,110	4,410	4,190	4,190
Urea Exports	854	536	872	743	559	777	777

Urea Consumed for Non-							
Agricultural Purposes	5,160	4,981	7,038	8,333	8,392	7,929	6,804

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for urea consumption for non-agricultural purposes spliced activity data from different sources: USGS data for 1990 through 2008, U. S. Census Bureau data for 2009 and 2010, and GHGRP data beginning in 2011. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare the data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

There is limited publicly available data on the quantities of urea produced and consumed for non-agricultural purposes. Therefore, the amount of urea used for non-agricultural purposes is estimated based on a balance that relies on estimates of urea production, urea imports, urea exports, and the amount of urea used as fertilizer. EPA uses an uncertainty range of ±5 percent for urea imports and urea exports, consistent with the ranges for activity data that are not obtained directly from plants, and using this suggested uncertainty provided in section 3.2.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). The primary uncertainties associated with this source category are associated with the accuracy of these estimates as well as the fact that each estimate is obtained from a different data source. Because urea production estimates are no longer available from the USGS, there is additional uncertainty associated with urea produced beginning in 2011. There is also uncertainty associated with the assumption that all of the carbon in urea is released into the environment as CO₂ during use.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-28. Carbon dioxide emissions associated with urea consumption for non-agricultural purposes during 2021 were estimated to be between 4.8 and 5.2 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 4 percent below and 4 percent above the emission estimate of 5.0 MMT CO₂ Eq.

Table 4-28: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Urea Consumption for Non-Agricultural Purposes (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Es					
Jource	dus	(MMT CO ₂ Eq.)	(MMT (CO ₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Urea Consumption								
for Non-Agricultural	CO_2	5.0	4.8	5.2	-4%	+4%		
Purposes								

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to reporting of urea production occurring at ammonia facilities can be found under Subpart G (Ammonia Manufacturing) of the regulation (40 CFR Part 98).²⁷ EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g.,

²⁷ See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98 main 02.tpl.

combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. 28 Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. EPA also conducts QA checks of GHGRP reported urea production data against external datasets including the USGS Minerals Yearbook data. The comparison shows consistent trends in urea production over time.

Recalculations Discussion

Based on updated quantities of urea applied for agricultural uses for 2015 to 2020, updated urea imports from USGS for 2020, and updated urea exports from USGS for 2020, recalculations were performed for 2015 through 2020. Compared to the previous Inventory, CO₂ emissions from urea consumption for non-agricultural purposes decreased by less than 1 percent (25 kt CO₂) for 2015, less than 1 percent (41 kt CO₂) for 2016, and less than 1 percent (21 kt CO₂) for 2017; increased by 1.33 percent (80 kt CO₂) for 2018 and by 1.82 percent (110 kt CO₂) for 2019; and decreased by 2.81 percent (168 kt CO₂) for 2020.

Planned Improvements

At this time, there are no specific planned improvements for estimating CO₂ emissions from urea consumption for non-agricultural purposes.

Nitric Acid Production (CRF Source Category 2B2)

Nitrous oxide (N2O) is emitted during the production of nitric acid (HNO3), an inorganic compound used primarily to make synthetic commercial fertilizers. Nitric acid is also a major component in the production of adipic acid—a feedstock for nylon—and explosives. Virtually all of the nitric acid produced in the United States is manufactured by the high-temperature catalytic oxidation of ammonia (EPA 1998). There are two different nitric acid production methods: weak nitric acid and high-strength nitric acid. The first method utilizes oxidation, condensation, and absorption to produce nitric acid at concentrations between 30 and 70 percent nitric acid. High-strength acid (90 percent or greater nitric acid) can be produced from dehydrating, bleaching, condensing, and absorption of the weak nitric acid. Most U.S. plants were built between 1960 and 2000. As of 2021, there were 31 active nitric acid production plants, including one high-strength nitric acid production plant in the United States (EPA 2010; EPA 2022).

The basic process technology for producing nitric acid has not changed significantly over time. During this process, N₂O is formed as a byproduct and released from reactor vents into the atmosphere. Emissions from fuels consumed for energy purposes during the production of nitric acid are included in the Energy chapter.

Nitric acid is made from the reaction of ammonia (NH₃) with oxygen (O₂) in two stages. The overall reaction is:

$$4NH_3 + 8O_2 \rightarrow 4HNO_3 + 4H_2$$

Currently, the nitric acid industry in the United States controls emissions of NO and NO2 (i.e., NOx), using a combination of non-selective catalytic reduction (NSCR) and selective catalytic reduction (SCR) technologies. In the

²⁸ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

process of destroying NO_x, NSCR systems are also very effective at destroying N₂O. Five nitric acid plants had NSCR systems installed between 1964 and 1977, over half due to the finalization of the Nitric Acid Plant New Source Performance Standards (NSPS) which went into effect in 1971. Four additional nitric acid plants had NSCR systems installed between 2016 and 2018, as a result of EPA Consent Decrees to control NO_x emissions more effectively. NSCR systems are used in approximately one-third of the weak acid production plants. For N₂O abatement, U.S. facilities are using both tertiary (i.e., NSCR and SCR) and secondary controls (i.e., catalysts added to the ammonia reactor to lessen potential N2O production).

Emissions from the production of nitric acid are generally directly proportional to the annual amount of nitric acid produced because emissions are calculated as the product of the total annual production and plant-specific emission factors. There are a few instances, however, where that relationship has not been directly proportional. For example, in 2015 and 2019, nitric acid production decreased and emissions increased compared to the respective preceding years. N₂O emissions for those years are calculated based on data from the GHGRP as discussed in the Methodology section below. According to data from plants reporting to GHGRP, plant-specific operations can affect the emission factor used, including: (1) site-specific fluctuations in ambient temperature and humidity, (2) catalyst age and condition, (3) process changes, such as fluctuations in process pressure or temperature and replacing the ammonia catalyst, (4) the addition, removal, maintenance, and utilization of abatement technologies, and (5) the number of nitric acid trains, which are reaction vessels where ammonia is oxidized to form nitric acid. Changes in those operating conditions for the years in question (2015 and 2019) caused changes in emission factors, which resulted in emissions changing disproportionally to production in those years.

Nitrous oxide emissions from this source were estimated to be 7.9 MMT CO₂ Eq. (30 kt of N₂O) in 2021 and are summarized in Table 4-29 and Table 4-30Emissions from nitric acid production have decreased by 27 percent since 1990, while production has increased by 8 percent over the same time period (see Table 4-29 and Table 4-30). Emissions have decreased by 39 percent since 1997, the highest year of production in the time series. From 2020 to 2021, nitric acid production decreased by 2.1 percent, leading to an overall decrease in emissions from nitric acid production of 4.8 percent from 2020 to 2021.

Table 4-29: N₂O Emissions from Nitric Acid Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9

Table 4-30: N₂O Emissions from Nitric Acid Production (kt N₂O)

Year	1990	2005	2017	2018	2019	2020	2021
Nitric Acid Production	41	38	31	32	34	31	30

Methodology and Time-Series Consistency

Emissions of N2O were calculated using the estimation methods provided by the 2006 IPCC Guidelines and a country-specific method utilizing EPA's GHGRP. A country-specific approach similar to the 2006 IPCC Guidelines Tier 3 method was used to estimate N₂O emissions for 2010 through 2021, whereas the IPCC Tier 2 method was used to estimate emissions from nitric acid production for 1990 through 2009.

2010 through 2021

Process N₂O emissions and nitric acid production data were obtained directly from EPA's GHGRP for 2010 through 2021 by aggregating reported facility-level data (EPA 2022).

Since 2010, in the United States, all nitric acid facilities that produce weak nitric acid (30 to 70 percent) have been required to report annual greenhouse gas emissions data to EPA as per the requirements of the GHGRP (Subpart

V). Beginning with 2018, the rule was changed to include facilities that produce nitric acid of any strength. The only facility that produces high-strength nitric acid also produces weak nitric acid. All N₂O emissions from nitric acid production originate from the production of weak nitric acid.

Process emissions and nitric acid production reported to the GHGRP provide complete estimates of greenhouse gas emissions for the United States because there are no reporting thresholds. While facilities are allowed to stop reporting to the GHGRP if the total reported emissions from nitric acid production are less than 25,000 metric tons CO₂ Eq. per year for five consecutive years or less than 15,000 metric tons CO₂ Eq. per year for three consecutive years, no facilities have stopped reporting as a result of these provisions. 29 All nitric acid facilities are required to either calculate process N2O emissions using a site-specific emission factor that is the average of the emission factor determined through annual performance tests for each nitric acid train under typical operating conditions or directly measure process N₂O emissions using monitoring equipment. ³⁰

Emissions from facilities vary from year to year, depending on the amount of nitric acid produced with and without abatement technologies and other conditions affecting the site-specific emission factor. To maintain consistency across the time series and with the rounding approaches taken by other data sets, GHGRP nitric acid data are rounded and are shown in Table 4-31.

1990 through 2009

Using GHGRP data for 2010, ³¹ country-specific N₂O emission factors were calculated for nitric acid production with abatement and without abatement (i.e., controlled and uncontrolled emission factors). The following 2010 emission factors were derived for production with abatement and without abatement: 3.3 kg N₂O/metric ton HNO₃ produced at plants using abatement technologies (e.g., tertiary systems such as NSCR systems) and 5.99 kg N₂O/metric ton HNO₃ produced at plants not equipped with abatement technology. Country-specific weighted emission factors were derived by weighting these emission factors by percent production with abatement and without abatement over time periods 1990 through 2008 and 2009. These weighted emission factors were used to estimate N₂O emissions from nitric acid production for years prior to the availability of GHGRP data (i.e., 1990 through 2008 and 2009). A separate weighted emission factor is included for 2009 due to data availability for that

EPA verified the installation dates of N₂O abatement technologies for all facilities based on GHGRP facility-level information and confirmed that all abatement technologies were accounted for in the derived emission factors (EPA 2021). No changes to N₂O abatement levels from 1990 through 2008 or for 2009 were made due to the review of GHGRP-reported N₂O abatement installation dates. Due to the lack of information on abatement equipment utilization, it is assumed that once abatement technology was installed in facilities, the equipment was consistently operational for the duration of the time series considered in this report (especially NSCRs).

The country-specific weighted N₂O emission factors were used in conjunction with annual production to estimate N₂O emissions for 1990 through 2009, using the following equations:

Equation 4-4: 2006 IPCC Guidelines Tier 3: N₂O Emissions From Nitric Acid Production (Equation 3.6)

$$E_i = P_i \times EF_{weighted,i}$$

²⁹ See 40 CFR 98.2(i)(1) and 40 CFR 98.2(i)(2) for more information about these provisions.

³⁰ Facilities must use standard methods - either EPA Method 320 or ASTM D6348-03 for annual performance tests - and must follow associated QA/QC procedures consistent with category-specific QC of direct emission measurements during these performance tests.

 $^{^{31}}$ National N₂O process emissions, national production, and national share of nitric acid production with abatement and without abatement technology was aggregated from the GHGRP facility-level data for 2010 to 2017 (i.e., percent production with and without abatement).

$$EF_{weighted,i} = \left[\left(\%P_{c,i} \times EF_c \right) + \left(\%P_{unc,i} \times EF_{unc} \right) \right]$$

where,

 E_{i} Annual N2O Emissions for year i (kg/yr)

 P_i Annual nitric acid production for year i (metric tons HNO₃)

Weighted N₂O emission factor for year i (kg N₂O/metric ton HNO₃) EF_{weighted,i}

%P_{c,i} Percent national production of HNO₃ with N₂O abatement technology (%)

 EF_c N₂O emission factor, with abatement technology (kg N₂O/metric ton HNO₃)

Percent national production of HNO₃ without N₂O abatement technology (%) $\%P_{\text{unc,i}}$

EF_{unc} N₂O emission factor, without abatement technology (kg N₂O/metric ton HNO₃)

year from 1990 through 2009

For 2009: Weighted N₂O emission factor = 5.46 kg N₂O/metric ton HNO₃.

For 1990 through 2008: Weighted N₂O emission factor = 5.66 kg N₂O/metric ton HNO₃.

Nitric acid production data for the United States for 1990 through 2009 were obtained from the U.S. Census Bureau (U.S. Census Bureau 2008, 2009, 2010a, 2010b) (see Table 4-31). EPA used GHGRP facility-level information to verify that all reported N₂O abatement equipment were incorporated into the estimation of N₂O emissions from nitric acid production over the full time series (EPA 2021).

Table 4-31: Nitric Acid Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	7,200	6,710	7,780	8,210	8,080	7,970	7,800

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for nitric acid production spliced activity data from two different sources: U. S. Census Bureau production data for 1990 through 2009 and GHGRP production data starting in 2010. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

Uncertainty associated with the parameters used to estimate N₂O emissions includes the share of U.S. nitric acid production attributable to each emission abatement technology (i.e., utilization) over the time series (especially prior to 2010), and the associated emission factors applied to each abatement technology type. While some information has been obtained through outreach with industry associations, limited information is available over the time series (especially prior to 2010) for a variety of facility level variables, including plant-specific production levels, plant production technology (e.g., low or high pressure, etc.), and abatement technology destruction and removal efficiency rates. Production data prior to 2010 were obtained from National Census Bureau, which does not provide uncertainty estimates with their data. Facilities reporting to EPA's GHGRP must measure production using equipment and practices used for accounting purposes. While emissions are often directly proportional to production, the emission factor for individual facilities can vary significantly from year to year due to site-specific fluctuations in ambient temperature and humidity, catalyst age and condition, nitric acid production process changes, the addition or removal of abatement technologies, and the number of nitric acid trains at the facility. At this time, EPA does not estimate uncertainty of the aggregated facility-level information. As noted in the QA/QC and verification section below, EPA verifies annual facility-level reports through a multi-step process (e.g.,

combination of electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. The annual production reported by each nitric acid facility under EPA's GHGRP and then aggregated to estimate national N₂O emissions is assumed to have low uncertainty. EPA assigned an uncertainty range of ±5 percent for facility-reported N₂O emissions, and using this suggested uncertainty provided in section 3.4.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty range of ±2 percent for nitric acid production, and using this suggested uncertainty provided in section 3.3.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-32. Nitrous oxide emissions from nitric acid production were estimated to be between 7.5 and 8.3 MMT CO2 Eq. at the 95 percent confidence level. This indicates a range of approximately 5 percent below to 5 percent above the 2021 emissions estimate of 7.9 MMT CO₂ Eq.

Table 4-32: Approach 2 Quantitative Uncertainty Estimates for N₂O Emissions from Nitric Acid Production (MMT CO₂ Eq. and Percent)

Course	Coo	2021 Emission Estimate	Uncertair	nty Range Relat	ive to Emission	Estimate ^a	
Source	Gas	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)		
			Lower Upper		Lower	Upper	
			Bound	Bound	Bound	Bound	
Nitric Acid Production	N ₂ O	7.9	7.5	8.3	-5%	+5%	

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details). More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to nitric acid facilities can be found under Subpart V: Nitric Acid Production of the GHGRP regulation (40 CFR Part 98). 32

The main QA/QC activities are related to annual performance testing, which must follow either EPA Method 320 or ASTM D6348-03. EPA verifies annual facility-level GHGRP reports through a multi-step process that is tailored to the Subpart (e.g., combination of electronic checks including range checks, statistical checks, algorithm checks, year-to-year comparison checks, along with manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred (EPA 2015). 33 EPA's review of observed trends noted that while emissions have generally mirrored production, in 2015 and 2019 nitric acid production decreased compared to the previous year and emissions increased. While review is ongoing, based on feedback from the verification process to date, these changes are due to facility-specific changes (e.g., in the nitric production process and management of abatement equipment).

³² See Subpart V monitoring and reporting regulation http://www.ecfr.gov/cgi-bin/textidx?tpl=/ecfrbrowse/Title40/40cfr98 main 02.tpl.

³³ See GHGRP Verification Factsheet https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp verification factsheet.pdf.

Recalculations Discussion

For the current Inventory, CO₂-equivalent estimates of total N₂O emissions from nitric acid production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N₂O has decreased from 298 to 265, leading to an overall decrease in estimates of CO₂-equivalent N₂O emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, N2O emissions decreased by 11 percent for each year of the time series, ranging from a decrease of 1.0 MMT CO₂ Eq. in 2020 to 1.6 MMT CO₂ Eq. in 1997. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Pending resources, EPA is considering a near-term improvement to both review and refine quantitative uncertainty estimates and the associated qualitative discussion.

Adipic Acid Production (CRF Source Category 2B3)

Adipic acid is produced through a two-stage process during which nitrous oxide (N2O) is generated in the second stage. The first stage of manufacturing usually involves the oxidation of cyclohexane to form a cyclohexanone/cyclohexanol mixture. The second stage involves oxidizing this mixture with nitric acid to produce adipic acid. Nitrous oxide is generated as a byproduct of the nitric acid oxidation stage and is emitted in the waste gas stream (Thiemens and Trogler 1991). The second stage is represented by the following chemical reaction:

$$(CH_2)_5CO(cyclohexanone) + (CH_2)_5CHOH(cyclohexanol) + wHNO_3$$

 $\rightarrow HOOC(CH_2)_4COOH(adipic\ acid) + xN_2O + yH_2O$

Process emissions from the production of adipic acid vary with the types of technologies and level of emission controls employed by a facility. In 1990, two major adipic acid-producing plants had N₂O abatement technologies in place and, as of 1998, three major adipic acid production facilities had control systems in place (Reimer et al. 1999). In 2021, thermal reduction was applied as an N₂O abatement measure at one adipic acid facility (EPA 2022). Emissions from fuels consumed for energy purposes during the production of adipic acid are accounted for in the Energy chapter.

Worldwide, only a few adipic acid plants exist. The United States, Europe, and China are the major producers, with the United States accounting for the largest share of global adipic acid production capacity in recent years. In 2021, the United States had two companies with a total of two adipic acid production facilities (one in Texas and one in Florida), following the ceased operations of a third major production facility at the end of 2015 (EPA 2022).

Adipic acid is a white crystalline solid used in the manufacture of synthetic fibers, plastics, coatings, urethane foams, elastomers, and synthetic lubricants. Commercially, it is the most important of the aliphatic dicarboxylic acids, which are used to manufacture polyesters. Eighty-four percent of all adipic acid produced in the United States is used in the production of nylon 6,6; 9 percent is used in the production of polyester polyols; 4 percent is used in the production of plasticizers; and the remaining 4 percent is accounted for by other uses, including

unsaturated polyester resins and food applications (ICIS 2007). Food grade adipic acid is used to provide some foods with a "tangy" flavor (Thiemens and Trogler 1991).

Compared to 1990, national adipic acid production in 2021 has increased by less than 1 percent to approximately 760,000 metric tons (ACC 2022). Nitrous oxide emissions from adipic acid production were estimated to be 6.6 MMT CO_2 Eq. (25 kt N_2O) in 2021 and are summarized in Table 4-33 and Table 4-34. Over the period 1990 through 2021, facilities have reduced emissions by 51 percent due to the widespread installation of pollution control measures in the late 1990s. The COVID-19 pandemic may have partially influenced the 11 percent decrease in N_2O emissions from adipic acid production between 2020 and 2021.

Significant changes in the amount of time that the N_2O abatement device at one facility was in operation has been the main cause of fluctuating emissions in recent years. These fluctuations are most evident for years where trends in emissions and adipic acid production were not directly proportional: (1) between 2016 and 2017, (2) between 2017 and 2018, and (3) between 2019 and 2020. As noted above, changes in control measures and abatement technologies at adipic acid production facilities, including maintenance of equipment, can result in annual emission fluctuations. Little additional information is available on drivers of trends, and the amount of adipic acid produced is not reported under EPA's GHGRP.

Table 4-33: N₂O Emissions from Adipic Acid Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6

Table 4-34: N₂O Emissions from Adipic Acid Production (kt N₂O)

Year	1990	2005	2017	2018	2019	2020	2021
Adipic Acid Production	51	24	25	35	18	28	25

Methodology and Time-Series Consistency

Emissions of N_2O were calculated using a combination of a country-specific approach utilizing EPA's GHGRP and Tier 2 and Tier 3 methods provided by the 2006 IPCC Guidelines. A country-specific approach similar to the 2006 IPCC Guidelines Tier 3 method was used to estimate emissions from adipic acid production for 2010 through 2021. For 1990 through 2009, emissions are estimated using both Tier 2 and Tier 3 methods consistent with the 2006 IPCC Guidelines. Due to confidential business information (CBI), plant names are not provided in this section; therefore, the four adipic acid-producing facilities that have operated over the time series will be referred to as Plants 1 through 4. As noted above, one currently operating facility uses thermal reduction as an N_2O abatement technology.

2010 through 2021

All emission estimates for 2010 through 2021 were obtained through analysis of GHGRP data (EPA 2010 through 2022). Facility-level greenhouse gas emissions data were obtained from EPA's GHGRP for the years 2010 through 2021 (EPA 2010 through 2022) and aggregated to national N_2O emissions. Consistent with IPCC Tier 3 methods, all adipic acid production facilities are required to either calculate N_2O emissions using a facility-specific emission

factor developed through annual performance testing under typical operating conditions or directly measure N2O emissions using monitoring equipment. 34

1990 through 2009

For years 1990 through 2009, which were prior to EPA's GHGRP reporting, for both Plants 1 and 2, emission estimates were obtained directly from the plant engineers and account for reductions due to control systems in place at these plants during the time series. These prior estimates are considered CBI and hence are not published (Desai 2010, 2011). These estimates were based on continuous process monitoring equipment installed at the two

For Plant 4, 1990 through 2009 N₂O emissions were estimated using the following Tier 2 equation from the 2006 IPCC Guidelines:

Equation 4-5: 2006 IPCC Guidelines Tier 2: N₂O Emissions From Adipic Acid Production (Equation 3.8)

$$E_{aa} = Q_{aa} \times EF_{aa} \times (1 - [DF \times UF])$$

where,

 E_{aa} N₂O emissions from adipic acid production, metric tons

Quantity of adipic acid produced, metric tons Qaa

Emission factor, metric ton N₂O/metric ton adipic acid produced $\mathsf{EF}_{\mathsf{aa}}$

DF N₂O destruction factor

UF Abatement system utility factor

The adipic acid production is multiplied by an emission factor (i.e., N₂O emitted per unit of adipic acid produced), which has been estimated to be approximately 0.3 metric tons of N₂O per metric ton of product (IPCC 2006). The "N₂O destruction factor" in the equation represents the percentage of N₂O emissions that are destroyed by the installed abatement technology. The "abatement system utility factor" represents the percentage of time that the abatement equipment operates during the annual production period. Plant-specific production data for Plant 4 were obtained across the time series through personal communications (Desai 2010, 2011). The plant-specific production data were then used for calculating emissions as described above.

For Plant 3, 2005 through 2009 emissions were obtained directly from the plant (Desai 2010, 2011). For 1990 through 2004, emissions were estimated using plant-specific production data and the IPCC factors as described above for Plant 4. Plant-level adipic acid production for 1990 through 2003 was estimated by allocating national adipic acid production data to the plant level using the ratio of known plant capacity to total national capacity for all U.S. plants (ACC 2022; CMR 2001, 1998; CW 1999; C&EN 1992 through 1995). For 2004, actual plant production data were obtained and used for emission calculations (CW 2005).

Plant capacities for 1990 through 1994 were obtained from Chemical & Engineering News, "Facts and Figures" and "Production of Top 50 Chemicals" (C&EN 1992 through 1995). Plant capacities for 1995 and 1996 were kept the same as 1994 data. The 1997 plant capacities were taken from Chemical Market Reporter, "Chemical Profile: Adipic Acid" (CMR 1998). The 1998 plant capacities for all four plants and 1999 plant capacities for three of the plants were obtained from Chemical Week, Product Focus: Adipic Acid/Adiponitrile (CW 1999). Plant capacities for the year 2000 for three of the plants were updated using Chemical Market Reporter, "Chemical Profile: Adipic Acid"

³⁴ Facilities must use standard methods, either EPA Method 320 or ASTM D6348-03 for annual performance testing, and must follow associated QA/QC procedures during these performance tests consistent with category-specific QC of direct emission measurements.

(CMR 2001). For 2001 through 2003, the plant capacities for three plants were held constant at year 2000 capacities. Plant capacity for 1999 to 2003 for the one remaining plant was kept the same as 1998.

National adipic acid production data (see Table 4-35) from 1990 through 2021 were obtained from the American Chemistry Council (ACC 2022).

Table 4-35: Adipic Acid Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	755	865	830	825	810	710	760

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for adipic acid production spliced activity data from multiple sources: plantspecific emissions data and publicly available plant capacity data for 1990 through 2009 and GHGRP emission data starting in 2010. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

Uncertainty associated with N₂O emission estimates includes the methods used by companies to monitor and estimate emissions. While some information has been obtained through outreach with facilities, limited information is available over the time series on these methods, abatement technology destruction and removal efficiency rates, and plant-specific production levels. EPA assigned an uncertainty range of ±5 percent for facilityreported N₂O emissions, and using this suggested uncertainty provided in section 3.4.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-36. Nitrous oxide emissions from adipic acid production for 2021 were estimated to be between 6.3 and 6.9 MMT CO₂ Eq. at the 95 percent confidence level. These values indicate a range of approximately 5 percent below to 5 percent above the 2021 emission estimate of 6.6 MMT CO₂ Eq.

Table 4-36: Approach 2 Quantitative Uncertainty Estimates for N₂O Emissions from Adipic Acid Production (MMT CO₂ Eq. and Percent)

Course	Coo	2021 Emission Estimate	Uncertaint	y Range Rela	tive to Emissi	on Estimate ^a	
Source	Gas	(MMT CO ₂ Eq.)	(MMT C	O ₂ Eq.)	(%)		
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	
Adipic Acid Production	N ₂ O	6.6	6.3	6.9	-5%	+5%	

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to adipic acid facilities can be found under Subpart E (Adipic Acid Production) of the GHGRP regulation (40 CFR Part 98). 35 The main

³⁵ See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

QA/QC activities are related to annual performance testing, which must follow either EPA Method 320 or ASTM D6348-03. EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). 36 Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year comparisons of reported data.

Recalculations Discussion

For the current Inventory, CO₂-equivalent estimates of total N₂O emissions from adipic acid production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N₂O has decreased from 298 to 265, leading to an overall decrease in estimates of CO₂-equivalent N₂O emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, N₂O emissions decreased by 11.1 percent for each year of the time series, ranging from a decrease of 0.3 MMT CO₂ Eq. in 2008 to 1.9 MMT CO₂ Eq. in 1995. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA plans to review GHGRP facility reported information on the date of abatement technology installation in order to better reflect trends and changes in emissions abatement within the industry across the time series. To date, the facility using the facility-specific emission factor developed through annual performance testing has reported no installation and no utilization of N2O abatement technology. The facility using direct measurement of N2O emissions has reported the use of thermal reduction as an N₂O abatement technology but is not required to report the date of installation.

Caprolactam, Glyoxal and Glyoxylic 4.9 **Acid Production (CRF Source Category 2B4)**

Caprolactam

Caprolactam (C₆H₁₁NO) is a colorless monomer produced for nylon-6 fibers and plastics. A substantial proportion of the fiber is used in carpet manufacturing. Most commercial processes used for the manufacture of caprolactam begin with benzene, but toluene can also be used. The production of caprolactam can give rise to significant emissions of nitrous oxide (N2O).

During the production of caprolactam, emissions of N2O can occur from the ammonia oxidation step, emissions of carbon dioxide (CO₂) from the ammonium carbonate step, emissions of sulfur dioxide (SO₂) from the ammonium bisulfite step, and emissions of non-methane volatile organic compounds (NMVOCs). Emissions of CO2, SO2 and NMVOCs from the conventional process are unlikely to be significant in well-managed plants. Modified

³⁶ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

caprolactam production processes are primarily concerned with elimination of the high volumes of ammonium sulfate that are produced as a byproduct of the conventional process (IPCC 2006).

In the most commonly used process where caprolactam is produced from benzene, benzene is hydrogenated to cyclohexane which is then oxidized to produce cyclohexanone ($C_6H_{10}O$). The classical route (Raschig process) and basic reaction equations for production of caprolactam from cyclohexanone are (IPCC 2006):

$$Oxidation\ of\ NH_3\ to\ \frac{NO}{NO_2}$$

$$\downarrow$$

$$NH_3\ reacted\ with\ \frac{CO_2}{H_2O}\ to\ yield\ ammonium\ carbonate\ (NH_4)_2CO_3$$

$$\downarrow$$

$$(NH_4)_2CO_3\ reacted\ with\ \frac{NO}{NO_2}\ (from\ NH_3\ oxidation) to\ yield\ ammonium\ nitrite\ (NH_4NO_2)$$

$$\downarrow$$

$$NH_3\ reacted\ with\ \frac{SO_2}{H_2O}\ to\ yield\ ammonium\ bisulphite\ (NH_4HSO_3)$$

$$\downarrow$$

$$NH_4NO_2\ and\ (NH_4HSO_3) reacted\ to\ yield\ hydroxylamine\ disulphonate\ (NOH(SO_3NH_4)_2)$$

$$\downarrow$$

$$(NOH(SO_3NH_4)_2)\ hydrolised\ to\ yield\ hydroxylamine\ sulphate\ ((NH_2OH)_2.\ H_2SO_4)\ and\ ammonium\ sulphate\ ((NH_4)_2SO_4)$$

$$\downarrow$$

$$Cylohexanone\ reaction:$$

 $C_6H_{10}O + \frac{1}{2}(NH_2OH)_2.H_2SO_4(+NH_3 \text{ and } H_2SO_4) \rightarrow C_6H_{10}NOH + (NH_4)_2SO_4 + H_2O$

Beckmann rearrangement:

In 2004, three facilities produced caprolactam in the United States (ICIS 2004). Another facility, Evergreen Recycling, was in operation from 2000 to 2001 (ICIS 2004; Textile World 2000) and from 2007 through 2015 (DOE 2011; Shaw 2015). Caprolactam production at Fibrant LLC (formerly DSM Chemicals) in Georgia ceased in 2018 (Cline 2019). As of 2021, two companies in the United States produced caprolactam at two facilities: AdvanSix (formerly Honeywell) in Virginia (AdvanSix 2022) and BASF in Texas (BASF 2022).

Nitrous oxide emissions from caprolactam production in the United States were estimated to be 1.2 MMT CO $_2$ Eq. (5 kt N $_2$ O) in 2021 and are summarized in Table 4-37 and Table 4-38. National emissions from caprolactam production decreased by approximately 17 percent over the period of 1990 through 2021. Emissions in 2021 increased by approximately 6 percent from the 2020 levels. This annual increase returned caprolactam production to levels consistent with 2019 before the COVID-19 pandemic.

Table 4-37: N₂O Emissions from Caprolactam Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Caprolactam Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2

Table 4-38: N₂O Emissions from Caprolactam Production (kt N₂O)

Year	1990	2005	2017	2018	2019	2020	2021
Caprolactam Production	6	7	5	5	5	4	5

Glyoxal

Glyoxal is mainly used as a crosslinking agent for vinyl acetate/acrylic resins, disinfectant, gelatin hardening agent, textile finishing agent (permanent-press cotton, rayon fabrics), and wet-resistance additive (paper coatings) (IPCC 2006). It is also used for enhanced oil-recovery. It is produced from oxidation of acetaldehyde with concentrated nitric acid, or from the catalytic oxidation of ethylene glycol, and N₂O is emitted in the process of oxidation of acetaldehyde.

Glyoxal (ethanedial) (C₂H₂O₂) is produced from oxidation of acetaldehyde (ethanal) (C₂H₄O) with concentrated nitric acid (HNO₃). Glyoxal can also be produced from catalytic oxidation of ethylene glycol (ethanediol) (CH₂OHCH₂OH).

Glyoxylic Acid

Glyoxylic acid is produced by nitric acid oxidation of glyoxal. Glyoxylic acid is used for the production of synthetic aromas, agrochemicals, and pharmaceutical intermediates (IPCC 2006).

EPA does not currently estimate the emissions associated with the production of glyoxal and glyoxylic acid because it is likely that these chemicals are imported and not produced in the United States. See Annex 5 for more information.

Methodology and Time-Series Consistency

Emissions of N₂O from the production of caprolactam were calculated using the estimation methods provided by the 2006 IPCC Guidelines. The 2006 IPCC Guidelines Tier 1 method was used to estimate emissions from caprolactam production for 1990 through 2021, as shown in this formula:

Equation 4-6: 2006 IPCC Guidelines Tier 1: N₂O Emissions From Caprolactam Production (Equation 3.9)

$$E_{N_2O} = EF \times CP$$

where,

 E_{N_2O} Annual N2O Emissions (kg)

EF N₂O emission factor (default) (kg N₂O/metric ton caprolactam produced)

CP Caprolactam production (metric tons)

During the caprolactam production process, N₂O is generated as a byproduct of the high temperature catalytic oxidation of ammonia (NH₃), which is the first reaction in the series of reactions to produce caprolactam. The amount of N₂O emissions can be estimated based on the chemical reaction shown above. Based on this formula, which is consistent with an IPCC Tier 1 approach, approximately 111.1 metric tons of caprolactam are required to generate one metric ton of N₂O, resulting in an emission factor of 9.0 kg N₂O per metric ton of caprolactam (IPCC 2006). When applying the Tier 1 method, the 2006 IPCC Guidelines state that it is good practice to assume that there is no abatement of N₂O emissions and to use the highest default emission factor available in the guidelines.

In addition, EPA did not find support for the use of secondary catalysts to reduce N₂O emissions, such as those employed at nitric acid plants.

The activity data for caprolactam production (see Table 4-39) from 1990 to 2021 were obtained from the American Chemistry Council's Guide to the Business of Chemistry (ACC 2022). EPA will continue to analyze and assess alternative sources of production data as a quality control measure.

Table 4-39: Caprolactam Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	626	795	545	530	515	490	520

Carbon dioxide and methane (CH₄) emissions may also occur from the production of caprolactam, but currently the IPCC does not have methodologies for calculating these emissions associated with caprolactam production.

Methodological approaches, consistent with IPCC guidelines, have been applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Estimation of emissions of N2O from caprolactam production can be treated as analogous to estimation of emissions of N₂O from nitric acid production. Both production processes involve an initial step of NH₃ oxidation, which is the source of N₂O formation and emissions (IPCC 2006). Therefore, uncertainties for the default emission factor values in the 2006 IPCC Guidelines are an estimate based on default values for nitric acid plants. In general, default emission factors for gaseous substances have higher uncertainties because mass values for gaseous substances are influenced by temperature and pressure variations and gases are more easily lost through process leaks. The default values for caprolactam production have a relatively high level of uncertainty due to the limited information available (IPCC 2006). EPA assigned uncertainty bounds of ±5 percent for caprolactam production, based on expert judgment. EPA assigned an uncertainty range of ±40 percent for the N₂O emission factor, and using this suggested uncertainty provided in Section 3.5.2.1 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-40. Nitrous oxide emissions from Caprolactam, Glyoxal and Glyoxylic Acid Production for 2021 were estimated to be between 0.8 and 1.6 MMT CO₂ Eq. at the 95 percent confidence level. These values indicate a range of approximately 32 percent below to 32 percent above the 2021 emission estimate of 1.2 MMT CO₂ Eq.

Table 4-40: Approach 2 Quantitative Uncertainty Estimates for N₂O Emissions from Caprolactam, Glyoxal and Glyoxylic Acid Production (MMT CO₂ Eq. and Percent)

Course	Coo	2021 Emission Estimate	Uncertaint	y Range Rela	tive to Emission	on Estimate ^a
Source	Gas	(MMT CO ₂ Eq.)	(MMT C	O ₂ Eq.)	(%)	
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Caprolactam Production	N ₂ O	1.2	0.8	1.6	-32%	+32%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

Recalculations were performed for 2020 to reflect updated caprolactam production data from the American Chemistry Council's Guide to the Business of Chemistry (ACC 2022). In addition, for the current Inventory, CO2equivalent total emission estimates of N2O from caprolactam production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N₂O decreased from 298 to 265, leading to an overall decrease in estimates of calculated CO₂-equivalent N₂O emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual N2O emissions decreased by 11 percent each year, ranging from a decrease of 0.15 MMT CO2 Eq. in 2020 to 0.25 MMT CO₂ Eq. in 2010 and 2011. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Pending resources, EPA will research other available datasets for caprolactam production and industry trends, including facility-level data. EPA continues to research the production process and emissions associated with the production of glyoxal and glyoxylic acid. Preliminary data suggests that glyoxal and glyoxylic acid may no longer be produced domestically and are largely imported to the United States. See Annex 5 for more information. This planned improvement is subject to data availability and will be implemented in the medium- to long-term.

4.10 Carbide Production and Consumption (CRF Source Category 2B5)

Carbon dioxide (CO₂) and methane (CH₄) are emitted from the production of silicon carbide (SiC), a material used for industrial abrasive applications as well as metallurgical and other non-abrasive applications in the United States. Emissions from fuels consumed for energy purposes during the production of silicon carbide are accounted for in the Energy chapter. Additionally, some metallurgical and non-abrasive applications of SiC are emissive, and while emissions should be accounted for where they occur based on 2006 IPCC Guidelines, emissions from SiC consumption are accounted for here until additional data on SiC consumption by end-use are available.

To produce SiC, silica sand or quartz (SiO2) is reacted with carbon (C) in the form of petroleum coke. A portion (about 35 percent) of the carbon contained in the petroleum coke is retained in the SiC. The remaining C is emitted as CO₂, CH₄, or carbon monoxide (CO). The overall reaction is shown below, but in practice, it does not proceed according to stoichiometry:

$$SiO_2 + 3C \rightarrow SiC + 2CO (+ O_2 \rightarrow 2CO_2)$$

Carbon dioxide and CH₄ are also emitted during the production of calcium carbide, a chemical used to produce acetylene. Carbon dioxide is implicitly accounted for in the storage factor calculation for the non-energy use of petroleum coke in the Energy chapter.

Markets for manufactured abrasives, including SiC, are heavily influenced by activity in the U.S. manufacturing sector, especially in the aerospace, automotive, furniture, housing, and steel manufacturing sectors. Specific applications of abrasive-grade SiC in 2017 included antislip abrasives, blasting abrasives, bonded abrasives, coated abrasives, polishing and buffing compounds, tumbling media, and wire-sawing abrasives. Approximately 50 percent of SiC is used in metallurgical applications, which include primarily iron and steel production, and other

non-abrasive applications, which include use in advanced or technical ceramics and refractories (USGS 1991a through 2021; Washington Mills 2023).

As a result of the economic downturn in 2008 and 2009, demand for SiC decreased in those years. Low-cost imports, particularly from China, combined with high relative operating costs for domestic producers, continue to put downward pressure on the production of SiC in the United States. Consumption of SiC in the United States has recovered somewhat from its low in 2009 to 2020; 2021 consumption data was withheld to avoid disclosing company proprietary data (USGS 1991b through 2021b).

Silicon carbide was manufactured by two facilities in the United States, one of which produced primarily nonabrasive SiC (USGS 2021). USGS production values for the United States consists of SiC used for abrasives and for metallurgical and other non-abrasive applications (USGS 2021). During the COVID-19 pandemic in 2020, the U.S. Department of Homeland Security considered abrasives manufacturing part of the critical manufacturing sector, and as a result, pandemic "stay-at-home" orders issued in March 2020 did not affect the abrasives manufacturing industry. These plants remained at full operation (USGS 2021a). Consumption of SiC decreased by approximately 25 percent in 2020 due to the pandemic and a sharp decline in imports and rebounded with an increase of approximately 30 percent from 2020 to 2021, remaining below pre-pandemic levels (U.S. Census Bureau 2005 through 2021).

Carbon dioxide emissions from SiC production and consumption in 2021 were 0.2 MMT CO₂ Eq. (172 kt CO₂), which are about 29 percent lower than emissions in 1990 (see Table 4-41 and Table 4-42). Approximately 53 percent of these emissions resulted from SiC production, while the remainder resulted from SiC consumption. Methane emissions from SiC production in 2021 were 0.01 MMT CO₂ Eq. (0.4 kt CH₄) (see Table 4-41 and Table 4-42). Emissions have not fluctuated greatly in recent years.

Table 4-41: CO₂ and CH₄ Emissions from Silicon Carbide Production and Consumption (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Production							
CO ₂	0.2	0.1	0.1	0.1	0.1	0.1	0.1
CH ₄	+	+	+	+	+	+	+
Consumption							
CO ₂	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Total	0.2	0.2	0.2	0.2	0.2	0.2	0.2

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 4-42: CO₂ and CH₄ Emissions from Silicon Carbide Production and Consumption (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production							
CO ₂	170	92	92	92	92	92	92
CH ₄	1	+	+	+	+	+	+
Consumption							
CO ₂	73	121	90	93	84	62	80
	10511						

⁺ Does not exceed 0.5 kt

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Emissions of CO₂ and CH₄ from the production of SiC were calculated using the Tier 1 method provided by the 2006 IPCC Guidelines. Annual estimates of SiC production were multiplied by the default emission factors, as shown below:

Equation 4-7: 2006 IPCC Guidelines Tier 1: Emissions from Carbide Production (Equation 3.11)

$$\begin{split} E_{sc,CO2} &= EF_{sc,CO2} \times Q_{sc} \\ E_{sc,CH4} &= EF_{sc,CH4} \times Q_{sc} \times \left(\frac{1 \ metric \ ton}{1000 \ kg}\right) \end{split}$$

where,

Esc.CO2 CO₂ emissions from production of SiC, metric tons

EF_{sc,CO2} Emission factor for production of SiC, metric ton CO₂/metric ton SiC

Quantity of SiC produced, metric tons Q_{sc}

CH₄ emissions from production of SiC, metric tons E_{sc.CH4}

EF_{sc,CH4} Emission factor for production of SiC, kilogram CH₄/metric ton SiC

Emission factors were taken from the 2006 IPCC Guidelines:

2.62 metric tons CO₂/metric ton SiC

11.6 kg CH₄/metric ton SiC

Production data includes silicon carbide manufactured for abrasive applications as well as for metallurgical and other non-abrasive applications (USGS 2021).

Silicon carbide industrial abrasives production data for 1990 through 2021 were obtained from the U.S. Geological Survey (USGS) Minerals Yearbook: Manufactured Abrasives (USGS 1991a through 2021). Silicon carbide production data published by USGS have been rounded to the nearest 5,000 metric tons to avoid disclosing company proprietary data. For the period 1990 through 2001, reported USGS production data include production from two facilities located in Canada that ceased operations in 1995 and 2001. Using SiC production data from Canada (ECCC 2022), U.S. SiC production for 1990 through 2001 was adjusted to reflect only U.S. production.

SiC consumption for the entire time series is estimated using USGS consumption data (USGS 1991b through 2021b) and data from the U.S. International Trade Commission (USITC) database on net imports and exports of SiC (U.S. Census Bureau 2005 through 2021) (see Table 4-43). Total annual SiC consumption (utilization) was estimated by subtracting annual exports of SiC from the annual total of national SiC production and annual imports.

Emissions of CO₂ from SiC consumption for metallurgical uses were calculated by multiplying the annual utilization of SiC for metallurgical uses (reported annually in the USGS Minerals Yearbook: Silicon) by the carbon content of SiC (30.0 percent), which was determined according to the molecular weight ratio of SiC. Because USGS withheld consumption data for metallurgical uses from publication for 2017, 2018, and 2021 due to concerns of disclosing company-specific sensitive information, SiC consumption for 2017 and 2018 were estimated using 2016 values, and SiC consumption for 2021 was estimated using the 2020 value.

Emissions of CO₂ from SiC consumption for other non-abrasive uses were calculated by multiplying the annual SiC consumption for non-abrasive uses by the carbon content of SiC (30 percent). The annual SiC consumption for nonabrasive uses was calculated by multiplying the annual SiC consumption (production plus net imports) by the percentage used in metallurgical and other non-abrasive uses (50 percent) (USGS 1991a through 2021) and then subtracting the SiC consumption for metallurgical use.

The petroleum coke portion of the total CO₂ process emissions from silicon carbide production is adjusted for within the Energy chapter, as these fuels were consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO₂ from Fossil Fuel Combustion (Section 3.1) and Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

Table 4-43: Production and Consumption of Silicon Carbide (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Production	65,000	35,000	35,000	35,000	35,000	35,000	35,000
Consumption	132,465	220,149	163,492	168,526	152,412	113,756	146,312

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Silicon carbide production data published by the USGS is rounded to the nearest 5,000 tons and has been consistently reported at 35,000 tons since 2003 to avoid disclosure of company proprietary data. This translates to an uncertainty range of ±7 percent for SiC production (USGS 2021). There is uncertainty associated with the emission factors used because they are based on stoichiometry as opposed to monitoring of actual SiC production plants. An alternative is to calculate emissions based on the quantity of petroleum coke used during the production process rather than on the amount of silicon carbide produced; however, these data were not available. For CH₄, there is also uncertainty associated with the hydrogen-containing volatile compounds in the petroleum coke (IPCC 2006). EPA assigned an uncertainty of ±10 percent for the Tier 1 CO2 and CH4 emission factors for the SiC production processes, and using this suggested uncertainty provided in Section 3.6.3.1 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). There is also uncertainty associated with the use or destruction of CH₄ generated from the process, in addition to uncertainty associated with levels of production, net imports, consumption levels, and the percent of total consumption that is attributed to metallurgical and other non-abrasive uses. EPA assigned an uncertainty range of ±5 percent for the primary data inputs for consumption (i.e., crude imports, ground and refined imports, crude exports, ground and refined exports, utilization [metallurgical applications]) to calculate overall uncertainty from SiC production, and using this suggested uncertainty provided in Section 3.6.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-44. Silicon carbide production and consumption CO_2 emissions from 2021 were estimated to be between 10 percent below and 10 percent above the emission estimate of 0.17 MMT CO_2 Eq. at the 95 percent confidence level. Silicon carbide production CH_4 emissions were estimated to be between 10 percent below and 11 percent above the emission estimate of 0.01 MMT CO_2 Eq. at the 95 percent confidence level.

Table 4-44: Approach 2 Quantitative Uncertainty Estimates for CH₄ and CO₂ Emissions from Silicon Carbide Production and Consumption (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a						
	Gus	(MMT CO ₂ Eq.)	(MMT C	O ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Silicon Carbide Production and Consumption	CO ₂	0.17	0.16	0.19	-10%	+10%			
Silicon Carbide Production	CH ₄	+	+	+	-10%	+11%			

⁺ Does not exceed 0.05 MMT CO₂ Eq.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Recalculations Discussion

Recalculations were performed for 1990 through 2001 to account for updated data on SiC production from Canada, which is used to revise production data to reflect only U.S. production. Compared to the previous Inventory, estimates of CO₂ emissions in 1997 increased by 3 kt CO₂, and estimates of CH₄ emissions increased by 11 metric tons CH₄.

Updated USITC data on 2019 SiC exports and 2020 SiC imports resulted in updated SiC consumption estimates for those years. Compared to the previous Inventory, SiC consumption values for 2019 and 2020 increased by less than 2 metric tons and 20 metric tons, respectively. These minimal increases did not impact emissions estimates, compared to the previous Inventory.

In addition, for the current Inventory, CO₂-equivalent estimates of total CH₄ emissions from carbide production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ increased from 25 to 28, leading to an overall increase in estimates for CO₂-equivalent CH₄ emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual CO₂-equivalent CH₄ emissions increased by 12 percent each year, ranging from an increase of 1.0 kt CO₂ Eq. in 2002 to 2.3 kt CO₂ Eq. in 1990. The net impact on the entire category from these updates was an average annual 0.7 percent increase in emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA is initiating research for data on SiC consumption by end-use for consideration in updating emissions estimates from SiC consumption and to account for emissions where they occur. This planned improvement is subject to data availability and will be implemented in the medium- to long-term given significance of emissions.

EPA has not integrated aggregated facility-level GHGRP information to inform estimates of CO₂ and CH₄ from SiC production and consumption. The aggregated information (e.g., activity data and emissions) associated with silicon carbide did not meet criteria to shield underlying confidential business information (CBI) from public disclosure. EPA plans to examine the use of GHGRP silicon carbide emissions data for possible use in emission estimates consistent with both Volume 1, Chapter 6 of the 2006 IPCC Guidelines and the latest IPCC guidance on the use of facility-level data in national inventories. This planned improvement is ongoing and has not been incorporated into this Inventory report. This is a long-term planned improvement.

4.11 Titanium Dioxide Production (CRF Source Category 2B6)

Titanium dioxide (TiO_2) is manufactured using one of two processes: the chloride process and the sulfate process. The chloride process uses petroleum coke and chlorine as raw materials and emits process-related carbon dioxide (CO_2) . Emissions from fuels consumed for energy purposes during the production of titanium dioxide are accounted for in the Energy chapter. The sulfate process does not use petroleum coke or other forms of carbon as a raw material and does not emit CO_2 . The chloride process is based on the following chemical reactions and does emit CO_2 :

$$2FeTiO_3 + 7Cl_2 + 3C \rightarrow 2TiCl_4 + 2FeCl_3 + 3CO_2$$

$$2TiCl_4 + 2O_2 \rightarrow 2TiO_2 + 4Cl_2$$

The carbon in the first chemical reaction is provided by petroleum coke, which is oxidized in the presence of the chlorine and $FeTiO_3$ (rutile ore) to form CO_2 . Since 2004, all TiO_2 produced in the United States has been produced using the chloride process, and a special grade of "calcined" petroleum coke is manufactured specifically for this purpose.

The principal use of TiO_2 is as a white pigment in paint, lacquers, and varnishes. It is also used as a pigment in the manufacture of plastics, paper, and other products. In 2021, U.S. TiO_2 production totaled 1,100,000 metric tons (USGS 2022). Five plants produced TiO_2 in the United States in 2021.

Emissions of CO_2 from titanium dioxide production in 2021 were estimated to be 1.5 MMT CO_2 Eq. (1,474 kt CO_2), which represents an increase of 23 percent since 1990 (see Table 4-45 and Table 4-46). Compared to 2020, emissions from titanium dioxide production increased by 24 percent in 2021, due to a 24 percent increase in production. The annual production increase in 2021 represents a return to production levels seen in 2019 before the COVID-19 pandemic.

Table 4-45: CO₂ Emissions from Titanium Dioxide (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Titanium Dioxide	1.2	1.8	1.7	1.5	1.5	1.2	1.5

Table 4-46: CO₂ Emissions from Titanium Dioxide (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Titanium Dioxide	1,195	1,755	1,688	1,541	1,474	1,193	1,474

Methodology and Time-Series Consistency

Emissions of CO₂ from TiO₂ production were calculated by multiplying annual national TiO₂ production by chloride process-specific emission factors using a Tier 1 approach provided in 2006 IPCC Guidelines. The Tier 1 equation is as follows:

Equation 4-8: 2006 IPCC Guidelines Tier 1: CO₂ Emissions from Titanium Production (Equation 3.12)

$$E_{td} = EF_{td} \times Q_{td}$$

where,

Etd = CO₂ emissions from TiO₂ production, metric tons

EF_{td} = Emission factor (chloride process), metric ton CO₂/metric ton TiO₂

Qtd = Quantity of TiO₂ produced, metric tons

The petroleum coke portion of the total CO_2 process emissions from TiO_2 production is adjusted for within the Energy chapter as these fuels were consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (Section 3.1 Fossil Fuel Combustion) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Data were obtained for the total amount of TiO_2 produced each year. For years prior to 2004, it was assumed that TiO_2 was produced using the chloride process and the sulfate process in the same ratio as the ratio of the total U.S. production capacity for each process. As of 2004, the last remaining sulfate process plant in the United States closed; therefore, 100 percent of production since 2004 used the chloride process (USGS 2005). An emission factor of 1.34 metric tons CO_2 /metric ton TiO_2 was applied to the estimated chloride-process production (IPCC 2006). It

was assumed that all TiO₂ produced using the chloride process was produced using petroleum coke, although some TiO₂ may have been produced with graphite or other carbon inputs.

Filed 01/31/24

The emission factor for the TiO₂ chloride process was taken from the 2006 IPCC Guidelines. Titanium dioxide production data and the percentage of total TiO₂ production capacity that used the chloride process for 1990 through 2018 (see Table 4-47) were obtained through the U.S. Geological Survey (USGS) Minerals Yearbook: Titanium (USGS 1991 through 2022). Production data for 2019 were obtained from the USGS Minerals Yearbook: Titanium, advanced data release of the 2019 tables (USGS 2021). Production data for 2020 and 2021 were obtained from the Minerals Commodity Summaries: Titanium and Titanium Dioxide (USGS 2022). 37 Data on the percentage of total TiO₂ production capacity that used the chloride process were not available for 1990 through 1993, so data from the 1994 USGS Minerals Yearbook were used for these years. Because a sulfate process plant closed in September 2001, the chloride process percentage for 2001 was estimated (Gambogi 2002). By 2002, only one sulfate process plant remained online in the United States, and this plant closed in 2004 (USGS 2005).

Table 4-47: Titanium Dioxide Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production	979	1,310	1,260	1,150	1,100	890	1,100

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Each year, the USGS collects titanium industry data for titanium mineral and pigment production operations. If TiO₂ pigment plants do not respond, production from the operations is estimated based on prior year production levels and industry trends. Variability in response rates fluctuates from 67 to 100 percent of TiO₂ pigment plants over the time series. EPA currently uses an uncertainty range of ±5 percent for the primary data inputs (i.e., TiO₂ production and chloride process capacity values) to calculate overall uncertainty from TiO₂ production, and using this suggested uncertainty provided in Section 3.7.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). Additionally, the EPA uses an uncertainty range of ±15 percent for the CO₂ chloride process carbon consumption rate, and using this uncertainty provided in Section 3.7.2.2 of the 2006 IPCC Guidelines is representative of operations in the United States. based on expert judgment (RTI 2023).

Although some TiO₂ may be produced using graphite or other carbon inputs, information and data regarding these practices were not available. Titanium dioxide produced using graphite inputs, for example, may generate differing amounts of CO₂ per unit of TiO₂ produced as compared to that generated using petroleum coke in production. While the most accurate method to estimate emissions would be to base calculations on the amount of reducing agent used in each process rather than on the amount of TiO₂ produced, sufficient data were not available to do SO.

As of 2004, the last remaining sulfate-process plant in the United States closed. Since annual TiO₂ production was not reported by USGS by the type of production process used (chloride or sulfate) prior to 2004 and only the percentage of total production capacity by process was reported, the percent of total TiO₂ production capacity that was attributed to the chloride process was multiplied by total TiO₂ production to estimate the amount of TiO₂ produced using the chloride process. Finally, the emission factor was applied uniformly to all chloride-process production, and no data were available to account for differences in production efficiency among chloride-process

³⁷ EPA has not integrated aggregated facility-level GHGRP information for titanium dioxide production facilities (40 CFR Part 98 Subpart EE). The relevant aggregated information (activity data, emission factor) from these facilities did not meet criteria to shield underlying CBI from public disclosure

plants. In calculating the amount of petroleum coke consumed in chloride-process TiO2 production, literature data were used for petroleum coke composition. Certain grades of petroleum coke are manufactured specifically for use in the TiO₂ chloride process; however, this composition information was not available. EPA assigned an uncertainty range of ±15 percent for the Tier 1 CO₂ emission factor for the titanium dioxide (chloride route) production process, and using this uncertainty provided in Table 3.9 of the 2006 IPCC Guidelines is representative of operations in the United States based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-48. Titanium dioxide consumption CO₂ emissions from 2021 were estimated to be between 1.3 and 1.7 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 13 percent below and 13 percent above the emission estimate of 1.5 MMT CO₂ Eq.

Table 4-48: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Titanium Dioxide Production (MMT CO₂ Eq. and Percent)

Sauras	2021 Emission Estin		Uncertainty Range Relative to Emission Estimate					
Source	Gas	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Titanium Dioxide Production	CO ₂	1.5	1.3	1.7	-13%	+13%		

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

Updated USGS data on TiO₂ production was available for 2020, resulting in updated emissions estimates for that year. Compared to the previous Inventory, emissions for 2020 decreased by 12 percent (110 kt CO₂ Eq.).

Planned Improvements

EPA plans to examine the use of GHGRP titanium dioxide emissions and other data for possible use in emission estimates consistent with both Volume 1, Chapter 6 of the 2006 IPCC Guidelines and the latest IPCC guidance on the use of facility-level data in national inventories. 38 This planned improvement is ongoing and has not been incorporated into this Inventory report. This is a long-term planned improvement given significance of these emissions.

³⁸ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

4.12 Soda Ash Production (CRF Source Category 2B7)

Carbon dioxide (CO₂) is generated as a byproduct of calcining trona ore to produce soda ash and is eventually emitted into the atmosphere. In addition, CO₂ may also be released when soda ash is consumed. Emissions from soda ash consumption not associated with glass production are reported under Section 4.4 Other Process Uses of Carbonates (CRF Category 2A4), and emissions from fuels consumed for energy purposes during the production and consumption of soda ash are accounted for in the Energy chapter.

Calcining involves placing crushed trona ore into a kiln to convert sodium bicarbonate into crude sodium carbonate that will later be filtered into pure soda ash. The emission of CO₂ during trona-based production is based on the following reaction:

$$2Na_2CO_3 \cdot NaHCO_3 \cdot 2H_2O(Trona) \rightarrow 3Na_2CO_3(Soda\ Ash) + 5H_2O + CO_2$$

Soda ash (sodium carbonate, Na₂CO₃) is a white crystalline solid that is readily soluble in water and strongly alkaline. Commercial soda ash is used as a raw material in a variety of industrial processes and in many familiar consumer products such as glass, soap and detergents, paper, textiles, and food. The largest use of soda ash is for glass manufacturing. Emissions from soda ash used in glass production are reported under Section 4.3, Glass Production (CRF Source Category 2A3). In addition, soda ash is used primarily to manufacture many sodium-based inorganic chemicals, including sodium bicarbonate, sodium chromates, sodium phosphates, and sodium silicates (USGS 2018b). Internationally, two types of soda ash are produced: natural and synthetic. The United States produces only natural soda ash and is second only to China in total soda ash production. Trona is the principal ore from which natural soda ash is made.

The United States represents about one-fifth of total world soda ash output (USGS 2021a). Only two states produce natural soda ash: Wyoming and California. Of these two states, net emissions of CO₂ from soda ash production were only calculated for Wyoming, due to specifics regarding the production processes employed in the state.³⁹ Based on 2021 reported data, the estimated distribution of soda ash by end-use in 2021 (excluding glass production) was chemical production, 53 percent; other uses, 16 percent; wholesale distributors (e.g., for use in agriculture, water treatment, and grocery wholesale), 11 percent; soap and detergent manufacturing, 10 percent; flue gas desulfurization, 7 percent; water treatment, 2 percent; and pulp and paper production, 2 percent (USGS 2022b).40

U.S. natural soda ash is competitive in world markets because it is generally considered a better-quality raw material than synthetically produced soda ash, and most of the world's soda ash is synthetic. Although the United States continues to be a major supplier of soda ash, China surpassed the United States in soda ash production in 2003, becoming the world's leading producer.

³⁹ In California, soda ash is manufactured using sodium carbonate-bearing brines instead of trona ore. To extract the sodium carbonate, the complex brines are first treated with CO₂ in carbonation towers to convert the sodium carbonate into sodium bicarbonate, which then precipitates from the brine solution. The precipitated sodium bicarbonate is then calcined back into sodium carbonate. Although CO₂ is generated as a byproduct, the CO₂ is recovered and recycled for use in the carbonation stage and is not emitted. A facility in a third state, Colorado, produced soda ash until the plant was idled in 2004. The lone producer of sodium bicarbonate no longer mines trona ore in the state. For a brief time, sodium bicarbonate was produced using soda ash feedstocks mined in Wyoming and shipped to Colorado. Prior to 2004, because the trona ore was mined in Wyoming, the production numbers given by the USGS included the feedstocks mined in Wyoming and shipped to Colorado. In this way, the sodium bicarbonate production that took place in Colorado was accounted for in the Wyoming numbers.

 $^{^{40}}$ Percentages may not add up to 100 percent due to independent rounding.

In 2021, CO2 emissions from the production of soda ash from trona ore were 1.7 MMT CO2 Eq. (1,714 kt CO2) (see Table 4-49 and Table 4-50). Total emissions from soda ash production in 2021 increased by approximately 17 percent compared to emissions in 2020, as soda ash production returned to 2018 levels observed before the COVID-19 pandemic. Emissions have increased by approximately 20 percent from 1990 levels.

Trends in emissions have remained relatively constant over the time series with some fluctuations since 1990. In general, these fluctuations were related to the behavior of the export market and the U.S. economy. The U.S. soda ash industry saw a decline in domestic and export sales caused by adverse global economic conditions in 2009, followed by a steady increase in production through 2019 before a significant decrease in 2020 due to the COVID-19 pandemic.

Table 4-49: CO₂ Emissions from Soda Ash Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7

Table 4-50: CO₂ Emissions from Soda Ash Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Soda Ash Production	1,431	1,655	1,753	1,714	1,792	1,461	1,714

Methodology and Time-Series Consistency

During the soda ash production process, trona ore is calcined in a rotary kiln and chemically transformed into a crude soda ash that requires further processing. Carbon dioxide and water are generated as byproducts of the calcination process. Carbon dioxide emissions from the calcination of trona ore can be estimated based on the chemical reaction shown above. Based on this formula and the IPCC default emission factor of 0.0974 metric tons CO₂ per metric ton of trona ore, both of which are consistent with an IPCC Tier 1 approach, one metric ton of CO₂ is emitted when approximately 10.27 metric tons of trona ore are processed (IPCC 2006). Thus, the 17.6 million metric tons of trona ore mined in 2021 for soda ash production (USGS 2022b) resulted in CO₂ emissions of approximately 1.7 MMT CO₂ Eq. (1,714 kt).

Once produced, most soda ash is consumed in chemical production, with minor amounts used in soap production, pulp and paper, flue gas desulfurization, and water treatment (excluding soda ash consumption for glass manufacturing). As soda ash is consumed for these purposes, additional CO₂ is usually emitted. Consistent with the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, emissions from soda ash consumption in chemical production processes are reported under Section 4.4 Other Process Uses of Carbonates (CRF Category 2A4).

Data is not currently available for the quantity of trona used in soda ash production. Because trona ore produced is used primarily for soda ash production, EPA assumes that all trona produced was used in soda ash production. The activity data for trona ore production (see Table 4-51) for 1990 through 2021 were obtained from the U.S. Geological Survey (USGS) Minerals Yearbook for Soda Ash (1994 through 2015b) and USGS Mineral Industry Surveys for Soda Ash (USGS 2016 through 2017, 2018a, 2019, 2020, 2021, 2022b). Soda ash production 41 data were collected by the USGS from voluntary surveys of the U.S. soda ash industry. EPA will continue to analyze and assess opportunities to use facility-level data from EPA's GHGRP to improve the emission estimates for the Soda Ash Production source category consistent with IPCC⁴² and UNFCCC guidelines.

⁴¹ EPA has assessed the feasibility of using emissions information (including activity data) from EPA's GHGRP program. At this time, the aggregated information associated with production of soda ash did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

⁴² See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

Table 4-51: Trona Ore Used in Soda Ash Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Trona Ore Usea	14,700	17,000	18,000	17,600	18,400	15,000	17,600

^a Trona ore use is assumed to be equal to trona ore production.

Methodological approaches were applied to the entire time series to ensure consistency in emissions estimates from 1990 through 2021.

Uncertainty

Emission estimates from soda ash production have relatively low associated uncertainty levels because reliable and accurate data sources are available for the emission factor and activity data for trona-based soda ash production. One source of uncertainty is the purity of the trona ore used for manufacturing soda ash. The emission factor used for this estimate assumes the ore is 100 percent pure and likely overestimates the emissions from soda ash manufacture. The average water-soluble sodium carbonate-bicarbonate content for ore mined in Wyoming ranges from 85.5 to 93.8 percent (USGS 1995c).

EPA is aware of one facility producing soda ash from a liquid alkaline feedstock process, based on EPA's GHGRP. Soda ash production data was collected by the USGS from voluntary surveys. A survey request was sent to each of the five soda ash producers, all of which responded, representing 100 percent of the total production data (USGS 2022b). EPA assigned an uncertainty range of ±5 percent for trona production, and using the this suggested uncertainty provided in Section 3.8.2.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty range of -15 percent to 0 percent range for the trona emission factor, based on expert judgment on the purity of mined trona (USGS 1995c).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-52. Soda ash production CO₂ emissions for 2021 were estimated to be between 1.5 and 1.8 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 9 percent below and 8 percent above the emission estimate of 1.7 MMT CO₂ Eq.

Table 4-52: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Soda Ash **Production (MMT CO₂ Eq. and Percent)**

Causas	2021 Emission Estimat		nate Uncertainty Range Relative to Emission Estima						
Source	Gas	(MMT CO₂ Eq.)	(MMT C	O ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Soda Ash Production	CO ₂	1.7	1.5	1.8	-9%	+8%			

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 359 of 1050 PageID 3807

Planned Improvements

EPA is assessing planned improvements for future reports, but at this time has no specific planned improvements for estimating CO₂ emissions from soda ash production.

4.13 Petrochemical Production (CRF Source Category 2B8)

The production of some petrochemicals results in carbon dioxide (CO₂) and methane (CH₄) emissions. Petrochemicals are chemicals isolated or derived from petroleum or natural gas. Carbon dioxide emissions from the production of acrylonitrile, carbon black, ethylene, ethylene dichloride, ethylene oxide, and methanol, and CH₄ emissions from the production of methanol and acrylonitrile are presented here and reported under IPCC Source Category 2B8. The petrochemical industry uses primary fossil fuels (i.e., natural gas, coal, petroleum, etc.) for nonfuel purposes in the production of carbon black and other petrochemicals. Emissions from fuels and feedstocks transferred out of the system for use in energy purposes (e.g., indirect or direct process heat or steam production) are currently accounted for in the Energy sector. The allocation and reporting of emissions from feedstocks transferred out of the system for use in energy purposes to the Energy chapter is consistent with the 2006 IPCC Guidelines.

Worldwide, more than 90 percent of acrylonitrile (vinyl cyanide, C₃H₃N) is made by way of direct ammoxidation of propylene with ammonia (NH₃) and oxygen over a catalyst. This process is referred to as the SOHIO process, named after the Standard Oil Company of Ohio (SOHIO) (IPCC 2006). The primary use of acrylonitrile is as the raw material for the manufacture of acrylic and modacrylic fibers. Other major uses include the production of plastics (acrylonitrile-butadiene-styrene [ABS] and styrene-acrylonitrile [SAN]), nitrile rubbers, nitrile barrier resins, adiponitrile, and acrylamide. All U.S. acrylonitrile facilities use the SOHIO process (AN 2014). The SOHIO process involves a fluidized bed reaction of chemical-grade propylene, ammonia, and oxygen over a catalyst. The process produces acrylonitrile as its primary product, and the process yield depends on the type of catalyst used and the process configuration. The ammoxidation process produces byproduct CO₂, carbon monoxide (CO), and water from the direct oxidation of the propylene feedstock and produces other hydrocarbons from side reactions.

Carbon black is a black powder generated by the incomplete combustion of an aromatic petroleum- or coal-based feedstock at a high temperature. Most carbon black produced in the United States is added to rubber to impart strength and abrasion resistance, and the tire industry is by far the largest consumer. The other major use of carbon black is as a pigment. The predominant process used in the United States to produce carbon black is the furnace black (or oil furnace) process. In the furnace black process, carbon black oil (a heavy aromatic liquid) is continuously injected into the combustion zone of a natural gas-fired furnace. Furnace heat is provided by the natural gas and a portion of the carbon black feedstock; the remaining portion of the carbon black feedstock is pyrolyzed to carbon black. The resultant CO₂ and uncombusted CH₄ are released from thermal incinerators used as control devices, process dryers, and equipment leaks. Three facilities in the United States use other types of carbon black processes. Specifically, one facility produces carbon black by the thermal cracking of acetylene-containing feedstocks (i.e., acetylene black process), a second facility produces carbon black by the thermal cracking of other hydrocarbons (i.e., thermal black process), and a third facility produces carbon black by the open burning of carbon black feedstock (i.e., lamp black process) (EPA 2000).

Ethylene (C_2H_4) is consumed in the production processes of the plastics industry including polymers such as high, low, and linear low density polyethylene (HDPE, LDPE, LLDPE); polyvinyl chloride (PVC); ethylene dichloride; ethylene oxide; and ethylbenzene. Virtually all ethylene is produced from steam cracking of ethane, propane, butane, naphtha, gas oil, and other feedstocks. The representative chemical equation for steam cracking of ethane to ethylene is shown below:

$$C_2H_6 \rightarrow C_2H_4 + H_2$$

Small amounts of CH₄ are also generated from the steam cracking process. In addition, CO₂ and CH₄ emissions result from combustion units.

Ethylene dichloride (C₂H₄Cl₂) is used to produce vinyl chloride monomer, which is the precursor to polyvinyl chloride (PVC). Ethylene dichloride was also used as a fuel additive until 1996 when leaded gasoline was phased out. Ethylene dichloride is produced from ethylene by either direct chlorination, oxychlorination, or a combination of the two processes (i.e., the "balanced process"); most U.S. facilities use the balanced process. The direct chlorination and oxychlorination reactions are shown below:

$$C_2H_4+Cl_2\rightarrow C_2H_4Cl_2 \text{ (direct chlorination)}$$

$$C_2H_4+\tfrac{1}{2}O_2+2HCl\rightarrow C_2H_4Cl_2+2H_2O \text{ (oxychlorination)}$$

$$C_2H_4+3O_2\rightarrow 2CO_2+2H_2O \text{ (direct oxidation of ethylene during oxychlorination)}$$

In addition to the byproduct CO₂ produced from the direction oxidation of the ethylene feedstock, CO₂ and CH₄ emissions are also generated from combustion units.

Ethylene oxide (C₂H₄O) is used in the manufacture of glycols, glycol ethers, alcohols, and amines. Approximately 70 percent of ethylene oxide produced worldwide is used in the manufacture of glycols, including monoethylene glycol. Ethylene oxide is produced by reacting ethylene with oxygen over a catalyst. The oxygen may be supplied to the process through either an air (air process) or a pure oxygen stream (oxygen process). The byproduct CO₂ from the direct oxidation of the ethylene feedstock is removed from the process vent stream using a recycled carbonate solution, and the recovered CO2 may be vented to the atmosphere or recovered for further utilization in other sectors, such as food production (IPCC 2006). The combined ethylene oxide reaction and byproduct CO2 reaction is exothermic and generates heat, which is recovered to produce steam for the process. The ethylene oxide process also produces other liquid and off-gas byproducts (e.g., ethane that may be burned for energy recovery within the process. Almost all facilities, except one in Texas, use the oxygen process to manufacture ethylene oxide (EPA 2008).

Methanol (CH₃OH) is a chemical feedstock most often converted into formaldehyde, acetic acid and olefins. It is also an alternative transportation fuel, as well as an additive used by municipal wastewater treatment facilities in the denitrification of wastewater. Methanol is most commonly synthesized from a synthesis gas (i.e., "syngas" – a mixture containing H₂, CO, and CO₂) using a heterogeneous catalyst. There are a number of process techniques that can be used to produce syngas. Worldwide, steam reforming of natural gas is the most common method; most methanol producers in the United States also use steam reforming of natural gas to produce syngas. Other syngas production processes in the United States include partial oxidation of natural gas and coal gasification.

Emissions of CO₂ and CH₄ from petrochemical production in 2021 were 33.2 MMT CO₂ Eq. (33,170 kt CO₂) and 0.4 MMT CO₂ Eq. (15 kt CH₄), respectively (see Table 4-53 and Table 4-54). Carbon dioxide emissions from petrochemical production are driven primarily from ethylene production, while CH₄ emissions are almost entirely from methanol production. Since 1990, total CO₂ emissions from petrochemical production increased by 53 percent, and CH₄ emissions increased by 65 percent. Emissions of CO₂ and CH₄ were higher in 2021 than in any preceding year. Compared to 2020, CO₂ emissions increased 11 percent in 2021, and CH₄ emissions increased 21 percent. The increases are due primarily to increased ethylene and methanol production, which have been driven by the increased natural gas production in the United States over the past decade, and to recovery from a strong hurricane season that temporarily shut down many facilities in Texas and Louisiana in 2020. Emissions from carbon black also increased significantly in 2021 as the industry began to recover from the lower production in 2020 as a result of the COVID-19 pandemic.

Table 4-53: CO₂ and CH₄ Emissions from Petrochemical Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
CO ₂	21.6	27.4	28.9	29.3	30.7	29.8	33.2
Carbon Black	3.4	4.3	3.3	3.4	3.3	2.6	3.0

Ethylene	13.1	19.0	20.0	19.4	20.7	20.7	22.8
Ethylene Dichloride	0.3	0.5	0.4	0.4	0.5	0.5	0.4
Ethylene Oxide	1.1	1.5	1.3	1.3	1.4	1.7	1.9
Acrylonitrile	1.2	1.3	1.0	1.3	1.0	0.9	0.9
Methanol	2.5	0.8	2.9	3.5	3.8	3.5	4.2
CH ₄	0.2	0.1	0.3	0.3	0.4	0.3	0.4
Acrylonitrile	+	+	+	+	+	+	+
Methanol	0.2	0.1	0.3	0.3	0.4	0.3	0.4
Total	21.9	27.5	29.2	29.7	31.1	30.1	33.6

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals by gas may not sum due to independent rounding.

Table 4-54: CO₂ and CH₄ Emissions from Petrochemical Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
CO ₂	21,611	27,383	28,890	29,314	30,702	29,780	33,170
Carbon Black	3,381	4,269	3,310	3,440	3,300	2,610	3,000
Ethylene	13,126	19,024	20,000	19,400	20,700	20,700	22,800
Ethylene Dichloride	254	455	412	440	503	456	376
Ethylene Oxide	1,123	1,489	1,250	1,300	1,370	1,680	1,930
Acrylonitrile	1,214	1,325	1,040	1,250	990	850	850
Methanol	2,513	821	2,878	3,484	3,839	3,484	4,214
CH ₄	9	3	10	12	13	12	15
Acrylonitrile	+	+	+	+	+	+	+
Methanol	9	3	10	12	13	12	14

⁺ Does not exceed 0.5 kt CH₄.

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Emissions of CO₂ and CH₄ were calculated using the estimation methods provided by the *2006 IPCC Guidelines* and country-specific methods from EPA's GHGRP. A country-specific approach similar to the IPCC Tier 2 method was used to estimate CO₂ emissions from production of carbon black, ethylene oxide, ethylene, and ethylene dichloride for 2010 through 2021. The Tier 2 method for petrochemicals is a total feedstock carbon (C) mass balance method used to estimate total CO₂ emissions, but it is not applicable for estimating CH₄ emissions. The Carbon Black, Ethylene, Ethylene Dichloride, and Ethylene Oxide section below describes two variations of Tier 2 methods that ethylene production facilities use to calculate emissions for reporting under the GHGRP. For 1990 through 2009, CO₂ emissions from production of carbon black, ethylene oxide, ethylene, and ethylene dichloride were calculated using a Tier 1 method consistent with the *2006 IPCC Guidelines*. The *2006 IPCC Guidelines* Tier 1 method was used to estimate CO₂ and CH₄ emissions from production of acrylonitrile and methanol.⁴³

As noted in the 2006 IPCC Guidelines, the total feedstock C mass balance method (Tier 2) is based on the assumption that all of the C input to the process is converted either into primary and secondary products or into CO₂. Further, the guideline states that while the total C mass balance method estimates total C emissions from the process, it does not directly provide an estimate of the amount of the total C emissions emitted as CO₂, CH₄, or non-CH₄ volatile organic compounds (NMVOCs). This method accounts for all the C as CO₂, including CH₄.

⁴³ EPA has not integrated aggregated facility-level GHGRP information for acrylonitrile and methanol production. The aggregated information associated with production of these petrochemicals did not meet criteria to shield underlying CBI from public disclosure.

Carbon Black, Ethylene, Ethylene Dichloride, and Ethylene Oxide 2010 through 2021

Carbon dioxide emissions and national production were aggregated directly from EPA's GHGRP dataset for 2010 through 2021 (EPA 2022). In 2021, data reported to the GHGRP included CO₂ emissions of 3,000,000 metric tons from carbon black production; 22,800,000 metric tons of CO₂ from ethylene production; 376,000 metric tons of CO_2 from ethylene dichloride production; and 1,930,000 metric tons of CO_2 from ethylene oxide production. These emissions reflect application of a country-specific approach similar to the IPCC Tier 2 method and were used to estimate CO₂ emissions from the production of carbon black, ethylene, ethylene dichloride, and ethylene oxide.

Since 2010, EPA's GHGRP, under Subpart X, requires all domestic producers of petrochemicals to report annual emissions and supplemental emissions information (e.g., production data, etc.) to facilitate verification of reported emissions. Under EPA's GHGRP, most petrochemical production facilities are required to use either a mass balance approach or CEMS to measure and report emissions for each petrochemical process unit to estimate facility-level process CO₂ emissions; ethylene production facilities also have a third option. The mass balance method is used by most facilities⁴⁴ and assumes that all the carbon input is converted into primary and secondary products, byproducts, or is emitted to the atmosphere as CO₂. To apply the mass balance, facilities must measure the volume or mass of each gaseous and liquid feedstock and product, mass rate of each solid feedstock and product, and carbon content of each feedstock and product for each process unit and sum for their facility. To apply the optional combustion methodology, ethylene production facilities must measure the quantity, carbon content, and molecular weight of the fuel to a stationary combustion unit when that fuel includes any ethylene process off-gas. These data are used to calculate the total CO₂ emissions from the combustion unit. The facility must also estimate the fraction of the emissions that is attributable to burning the ethylene process off-gas portion of the fuel. This fraction is multiplied by the total emissions to estimate the emissions from ethylene production. The QA/QC and Verification section below has a discussion of non-CO₂ emissions from ethylene production facilities.

All non-energy uses of residual fuel and some non-energy uses of "other oil" are assumed to be used in the production of carbon black; therefore, consumption of these fuels is adjusted for within the Energy chapter to avoid double-counting of emissions from fuel used in the carbon black production presented here within IPPU sector. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO₂ from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion (IPCC Source Category 1A)) and Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

1990 through 2009

Prior to 2010, for each of these 4 types of petrochemical processes, an average national CO₂ emission factor was calculated based on the GHGRP data and applied to production for earlier years in the time series (i.e., 1990 through 2009) to estimate CO₂ emissions from carbon black, ethylene, ethylene dichloride, and ethylene oxide production. For carbon black, ethylene, ethylene dichloride, and ethylene oxide carbon dioxide emission factors were derived from EPA's GHGRP data by dividing annual CO₂ emissions for petrochemical type "i" with annual production for petrochemical type "i" and then averaging the derived emission factors obtained for each calendar year 2010 through 2013 (EPA 2019). The years 2010 through 2013 were used in the development of carbon dioxide emission factors as these years are more representative of operations in 1990 through 2009 for these facilities. The average emission factors for each petrochemical type were applied across all prior years because petrochemical production processes in the United States have not changed significantly since 1990, though some operational efficiencies have been implemented at facilities over the time series.

The average country-specific CO₂ emission factors that were calculated from the GHGRP data are as follows:

 $^{^{44}}$ A few facilities producing ethylene dichloride, ethylene, and methanol used CO_2 CEMS; those CO_2 emissions have been included in the aggregated GHGRP emissions presented here.

- 2.59 metric tons CO₂/metric ton carbon black produced
- 0.79 metric tons CO₂/metric ton ethylene produced
- 0.040 metric tons CO₂/metric ton ethylene dichloride produced
- 0.46 metric tons CO₂/metric ton ethylene oxide produced

Annual production data for carbon black for 1990 through 2009 were obtained from the International Carbon Black Association (Johnson 2003 and 2005 through 2010). Annual production data for ethylene, ethylene dichloride, and ethylene oxide for 1990 through 2009 were obtained from the American Chemistry Council's (ACC's) *Business of Chemistry* (ACC 2022a).

Acrylonitrile

Carbon dioxide and methane emissions from acrylonitrile production were estimated using the Tier 1 method in the 2006 IPCC Guidelines. Annual acrylonitrile production data were used with IPCC default Tier 1 CO₂ and CH₄ emission factors to estimate emissions for 1990 through 2021. Emission factors used to estimate acrylonitrile production emissions are as follows:

- 0.18 kg CH₄/metric ton acrylonitrile produced
- 1.00 metric tons CO₂/metric ton acrylonitrile produced

Annual acrylonitrile production data for 1990 through 2021 were obtained from ACC's *Business of Chemistry* (ACC 2022a). EPA is not able to apply the aggregated facility-level GHGRP information for acrylonitrile production needed for a Tier 2 approach. The aggregated information associated with production of these petrochemicals did not meet criteria to shield underlying CBI from public disclosure.

Methanol

Carbon dioxide and methane emissions from methanol production were estimated using the Tier 1 method in the 2006 IPCC Guidelines. Annual methanol production data were used with IPCC default Tier 1 CO_2 and CH_4 emission factors to estimate emissions for 1990 through 2021. Emission factors used to estimate methanol production emissions are as follows:

- 2.3 kg CH₄/metric ton methanol produced
- 0.67 metric tons CO₂/metric ton methanol produced

Annual methanol production data for 1990 through 2021 were obtained from the ACC's *Business of Chemistry* (ACC 2022a, ACC 2022b). EPA is not able to apply the aggregated facility-level GHGRP information for methanol production needed for a Tier 2 approach. The aggregated information associated with production of these petrochemicals did not meet criteria to shield underlying CBI from public disclosure.

Table 4-55: Production of Selected Petrochemicals (kt)

Chemical	1990	2005	2017	2018	2019	2020	2021
Carbon Black	1,307	1,651	1,240	1,280	1,210	990	1,140
Ethylene	16,542	23,975	27,800	30,500	32,400	33,500	34,700
Ethylene Dichloride	6,283	11,260	12,400	12,500	12,600	11,900	11,500
Ethylene Oxide	2,429	3,220	3,350	3,310	3,800	4,680	4,860
Acrylonitrile	1,214	1,325	1,040	1,250	990	850	850
Methanol	3,750	1,225	4,295	5,200	5,730	5,200	6,290

As noted earlier in the introduction section of the Petrochemical Production section, the allocation and reporting of emissions from both fuels and feedstocks transferred out of the system for use in energy purposes to the Energy chapter differs slightly from the 2006 IPCC Guidelines. According to the 2006 IPCC Guidelines, emissions from fuel combustion from petrochemical production should be allocated to this source category within the IPPU chapter.

Due to national circumstances, EIA data on primary fuel for feedstock use within the energy balance are presented by commodity only, with no resolution on data by industry sector (i.e., petrochemical production). In addition, under EPA's GHGRP, reporting facilities began reporting in 2014 on annual feedstock quantities for mass balance and CEMS methodologies (79 FR 63794), as well as the annual average carbon content of each feedstock (and molecular weight for gaseous feedstocks) for the mass balance methodology beginning in reporting year 2017 (81 FR 89260). ⁴⁵ The United States is currently unable to report non-energy fuel use from petrochemical production under the IPPU chapter due to CBI issues. Therefore, consistent with 2006 IPCC Guidelines, fuel consumption data reported by EIA are modified to account for these overlaps to avoid double-counting. More information on the non-energy use of fossil fuel feedstocks for petrochemical production can be found in Annex 2.3.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for ethylene production, ethylene dichloride production, and ethylene oxide production spliced activity data from two different sources: ACC for 1990 through 2009 and GHGRP for 2010 through 2021. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare the two data sets for years where there was overlap. For ethylene production, the data sets were determined to be consistent, and adjustments were not needed. For ethylene dichloride production and ethylene oxide production, the data sets were determined to be inconsistent. The GHGRP data includes production of ethylene dichloride and ethylene oxide as intermediates while it is unclear if the ACC data does; therefore, no adjustments were made to the ethylene dichloride and ethylene oxide activity data for 1990 through 2009 because the 2006 IPCC Guidelines indicate that it is not good practice to use the overlap technique when the data sets are inconsistent. The methodology for carbon black production also spliced activity data from two different sources: ICBA for 1990 through 2009 and GHGRP for 2010 through 2021. The overlap technique was applied to these data for 2010 and 2011. The data sets were determined to be consistent, and adjustments were not needed.

Uncertainty

The CO₂ and CH₄ emission factors used for methanol and acrylonitrile production are based on a limited number of studies. Using plant-specific factors instead of default or average factors could increase the accuracy of the emission estimates; however, such data were not available for the current Inventory report. For methanol, EPA assigned an uncertainty range of ±30 percent for the CO₂ emission factor and -80 percent to +30 percent for the CH₄ emission factor, and using this suggested uncertainty provided in Table 3.27 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). For acrylonitrile, EPA assigned an uncertainty range of ±60 percent for the CO₂ emission factor and ±10 percent for the CH₄ emission factor, and using this suggested uncertainty provided in Table 3.27 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of the quantitative uncertainty analysis for the CO₂ emissions from carbon black production, ethylene, ethylene dichloride, and ethylene oxide are based on reported GHGRP data. Refer to the Methodology section for more details on how these emissions were calculated and reported to EPA's GHGRP. EPA assigned CO₂ emissions from carbon black, ethylene, ethylene dichloride, and ethylene oxide production an uncertainty range of ±5 percent, and using this suggested uncertainty provided in Table 3.27 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). In the absence of other data, these values have been assessed as reasonable. There is some uncertainty in the applicability of the average emission factors for each petrochemical type across all prior years. While petrochemical production processes in the United States have not changed significantly since 1990, some operational efficiencies have been implemented at facilities over the time series.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-56. Petrochemical production CO₂ emissions from 2021 were estimated to be between 31.4 and 35.0 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 5 percent below to 6 percent above the emission estimate of 33.2 MMT CO₂ Eq. Petrochemical production CH₄ emissions from 2021 were estimated to be between

⁴⁵ See https://www.epa.gov/ghgreporting/historical-rulemakings.

0.14 and 0.50 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 58 percent below to 48 percent above the emission estimate of 0.4 MMT CO_2 Eq.

Table 4-56: Approach 2 Quantitative Uncertainty Estimates for CH₄ Emissions from Petrochemical Production and CO₂ Emissions from Petrochemical Production (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Unce	rtainty Range R	elative to Emiss	sion Estimate ^a
		(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Petrochemical Production	CO ₂	33.2	31.4	35.0	-5%	+6%
Petrochemical Production	CH ₄	0.4	0.14	0.50	-58%	+48%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For Petrochemical Production, QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan, as described in the QA/QC and Verification Procedures section of the IPPU chapter and Annex 8. Source-specific quality control measures for this category included the QA/QC requirements and verification procedures of EPA's GHGRP. More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to petrochemical facilities can be found under Subpart X (Petrochemical Production) of the regulation (40 CFR Part 98). ⁴⁶ EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). ⁴⁷ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. EPA also conducts QA checks of GHGRP reported production data by petrochemical type against external datasets.

For ethylene, ethylene dichloride, and ethylene oxide, it is possible to compare CO₂ emissions calculated using the GHGRP data to the CO₂ emissions that would have been calculated using the Tier 1 approach if GHGRP data were not available. For ethylene, the GHGRP emissions were within 5 percent of the emissions calculated using the Tier 1 approach prior to 2017; in 2017 through 2021, the GHGRP emissions have been between 7 percent and 18 percent lower than what would be calculated using the Tier 1 approach. For ethylene dichloride, the GHGRP emissions are typically higher than the Tier 1 emissions by up to 25 percent, but in 2021, GHGRP emissions were a few percentage points lower than the Tier 1 emissions. For ethylene oxide, GHGRP emissions typically vary from the Tier 1 emissions by up to ±20 percent, but in 2021, the GHGRP emissions are significantly higher than the Tier 1 emissions. This is likely due to GHGRP data capturing the production of ethylene oxide as an intermediate in the onsite production of ethylene glycol.

EPA's GHGRP mandates that all petrochemical production facilities report their annual emissions of CO_2 , CH_4 , and N_2O from each of their petrochemical production processes. Source-specific quality control measures for the Petrochemical Production category included the QA/QC requirements and verification procedures of EPA's GHGRP. The QA/QC requirements differ depending on the calculation methodology used.

⁴⁶ See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98 main 02.tpl.

⁴⁷ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

As part of a planned improvement effort, EPA has assessed the potential of using GHGRP data to estimate CH₄ emissions from ethylene production. As discussed in the Methodology and Time Series Consistency section above, CO₂ emissions from ethylene production in this chapter are based on data reported under the GHGRP, and these emissions are calculated using a Tier 2 approach that assumes all of the carbon in the fuel (i.e., ethylene process off-gas) is converted to CO₂. Ethylene production facilities also calculate and report CH₄ emissions under the GHGRP when they use the optional combustion methodology. The facilities calculate CH4 emissions from each combustion unit that burns off-gas from an ethylene production process unit using a Tier 1 approach based on the total quantity of fuel burned, a default higher heating value, and a default emission factor. Because multiple other types of fuel in addition to the ethylene process unit off-gas may be burned in these combustion units, the facilities also report an estimate of the fraction of emissions that is due to burning the ethylene process off-gas component of the total fuel. Multiplying the total emissions by the estimated fraction provides an estimate of the CH₄ emissions from the ethylene production process unit. These ethylene production facilities also calculate CH₄ emissions from flares that burn process vent emissions from ethylene processes. The emissions are calculated using either a Tier 2 approach based on measured gas volumes and measured carbon content or higher heating value, or a Tier 1 approach based on the measured gas flow and a default emission factor. Nearly all ethylene production facilities use the optional combustion methodology under the GHGRP, and the sum of reported CH₄ emissions from combustion in stationary combustion units and flares at all of these facilities is on the same order of magnitude as the combined CH4 emissions presented in this chapter from methanol and acrylonitrile production. The CH₄ emissions from ethylene production under the GHGRP have not been included in this chapter because this approach double counts carbon (i.e., all of the carbon in the CH₄ emissions is also included in the CO₂ emissions from the ethylene process units). EPA continues to assess the GHGRP data for ways to better disaggregate the data and incorporate it into the inventory.

These facilities are also required to report emissions of N₂O from combustion of ethylene process off-gas in both stationary combustion units and flares. Facilities using CEMS (consistent with a Tier 3 approach) are also required to report emissions of CH₄ and N₂O from combustion of petrochemical process-off gases in flares. Preliminary analysis of the aggregated reported CH₄ and N₂O emissions from facilities using CEMS and N₂O emissions from facilities using the optional combustion methodology suggests that these annual emissions are less than 0.4 percent of total petrochemical emissions, which is not significant enough to prioritize for inclusion in the report at this time. Pending resources and significance, EPA may include these N₂O emissions in future reports to enhance completeness.

Future QC efforts to validate the use of Tier 1 default emission factors and report on the comparison of Tier 1 emission estimates and GHGRP data are described below in the Planned Improvements section.

Recalculations Discussion

The acrylonitrile and methanol production quantities for 2020 were updated with the revised values in ACC's Business of Chemistry (ACC 2022a, ACC 2022b). These changes resulted in a 0.8 percent (240 kt) decrease in total petrochemical CO₂ Eq. emissions for 2020, compared to the previous Inventory.

In addition, for the current Inventory, CO₂-equivalent estimates of total CH₄ emissions from acrylonitrile and methanol production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ increased from 25 to 28, leading to an overall increase in estimates for CO₂-equivalent CH₄ emissions. Compared to the previous Inventory, which applied 100year GWP values from AR4, annual CH4 emissions increased by 12 percent each year, ranging from an increase of 5.4 kt CO₂ Eq. in 2011 to 42.1 kt CO₂ Eq. in 1997. The net impact on the entire category from these updates was an average annual 0.1 percent increase in emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Improvements include completing category-specific QC of activity data and emission factors, along with further assessment of CH_4 and N_2O emissions to enhance completeness in reporting of emissions from U.S. petrochemical production, pending resources, significance and time-series consistency considerations. For example, EPA is planning additional assessment of ways to use CH_4 data from the GHGRP in the Inventory. One possible approach EPA is assessing would be to adjust the CO_2 emissions from the GHGRP downward by subtracting the carbon that is also included in the reported CH_4 emissions, per the discussion in the Petrochemical Production QA/QC and Verification section, above. As of this current report, timing and resources have not allowed EPA to complete this analysis of activity data, emissions, and emission factors and remains a priority improvement within the IPPU chapter.

Pending resources, a secondary potential improvement for this source category would focus on continuing to analyze the fuel and feedstock data from EPA's GHGRP to better disaggregate energy-related emissions and allocate them more accurately between the Energy and IPPU sectors of the Inventory. It is important to ensure no double counting of emissions between fuel combustion, non-energy use of fuels, and industrial process emissions. For petrochemical feedstock production, EPA review of the categories suggests this is not a significant issue since the non-energy use industrial release data includes different categories of sources and sectors than those included in the IPPU emissions category for petrochemicals. As noted previously in the methodology section, data integration is not available at this time because feedstock data from the EIA used to estimate non-energy uses of fuels are aggregated by fuel type, rather than disaggregated by both fuel type and particular industries. Also, GHGRP-reported data on quantities of fuel consumed as feedstocks by petrochemical producers are unable to be used due to the data failing GHGRP CBI aggregation criteria. EPA will continue to look for ways to incorporate this data into future Inventories that will allow for easier data integration between the non-energy uses of fuels category and the petrochemicals category presented in this chapter. This planned improvement is still under development and has not been completed to report on progress in this current Inventory.

4.14 HCFC-22 Production (CRF Source Category 2B9a)

Trifluoromethane (HFC-23 or CHF₃) is generated as a byproduct during the manufacture of chlorodifluoromethane (HCFC-22), which is primarily employed in refrigeration and air conditioning systems and as a chemical feedstock for manufacturing synthetic polymers. Between 1990 and 2000, U.S. production of HCFC-22 increased significantly as HCFC-22 replaced chlorofluorocarbons (CFCs) in many applications. Between 2000 and 2007, U.S. production fluctuated but generally remained above 1990 levels. In 2008 and 2009, U.S. production declined markedly and has remained near 2009 levels since. Because HCFC-22 depletes stratospheric ozone, its production for non-feedstock uses was phased out in 2020 under the U.S. Clean Air Act. ⁴⁸ Feedstock production, however, is permitted to continue indefinitely.

HCFC-22 is produced by the reaction of chloroform (CHCl₃) and hydrogen fluoride (HF) in the presence of a catalyst, $SbCl_5$. The reaction of the catalyst and HF produces $SbCl_xF_y$, (where x + y = 5), which reacts with chlorinated hydrocarbons to replace chlorine atoms with fluorine. The HF and chloroform are introduced by submerged piping into a continuous-flow reactor that contains the catalyst in a hydrocarbon mixture of chloroform and partially fluorinated intermediates. The vapors leaving the reactor contain HCFC-21 (CHCl₂F), HCFC-22 (CHClF₂), HFC-23

4-70 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁴⁸ As construed, interpreted, and applied in the terms and conditions of the *Montreal Protocol on Substances that Deplete the Ozone Layer* [42 U.S.C. §7671m(b), CAA §614].

(CHF₃), HCl, chloroform, and HF. The under-fluorinated intermediates (HCFC-21) and chloroform are then condensed and returned to the reactor, along with residual catalyst, to undergo further fluorination. The final vapors leaving the condenser are primarily HCFC-22, HFC-23, HCl and residual HF. The HCl is recovered as a useful byproduct, and the HF is removed. Once separated from HCFC-22, the HFC-23 may be released to the atmosphere, recaptured for use in a limited number of applications, or destroyed.

Two facilities produced HCFC-22 in the United States in 2021. Emissions of HFC-23 from this activity in 2021 were estimated to be 2.2 MMT CO₂ Eq. (0.1 kt) (see Table 4-57 and Table 4-58). This quantity represents a 27 percent increase from 2020 emissions and a 94 percent decrease from 1990 emissions. The decrease from 1990 emissions was caused primarily by changes in the HFC-23 emission rate (kg HFC-23 emitted/kg HCFC-22 produced). The increase from 2020 emissions was caused by both an increase in the HFC-23 emission rate at one plant and an increase in the total quantity of HCFC-22 produced. The long-term decrease in the emission rate is primarily attributable to six factors: (a) five plants that did not capture and destroy the HFC-23 generated have ceased production of HCFC-22 since 1990; (b) one plant that captures and destroys the HFC-23 generated began to produce HCFC-22; (c) one plant implemented and documented a process change that reduced the amount of HFC-23 generated; (d) the same plant began recovering HFC-23, primarily for destruction and secondarily for sale; (e) another plant began destroying HFC-23; and (f) the same plant, whose emission rate was higher than that of the other two plants, ceased production of HCFC-22 in 2013.

Table 4-57: HFC-23 Emissions from HCFC-22 Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2

Table 4-58: HFC-23 Emissions from HCFC-22 Production (kt HFC-23)

Year	1990	2005	2017	2018	2019	2020	2021
HCFC-22 Production	3	1	+	+	+	+	+

⁺ Does not exceed 0.5 kt

Methodology and Time-Series Consistency

To estimate HFC-23 emissions for five of the eight HCFC-22 plants that have operated in the United States since 1990, methods comparable to the Tier 3 methods in the 2006 IPCC Guidelines (IPCC 2006) were used throughout the time series. Emissions for 2010 through 2021 were obtained through reports submitted by U.S. HCFC-22 production facilities to EPA's Greenhouse Gas Reporting Program (GHGRP). EPA's GHGRP mandates that all HCFC-22 production facilities report their annual emissions of HFC-23 from HCFC-22 production processes and HFC-23 destruction processes. Previously, data were obtained by EPA through collaboration with an industry association that received voluntarily reported HCFC-22 production and HFC-23 emissions annually from all U.S. HCFC-22 producers from 1990 through 2009. These emissions were aggregated and reported to EPA on an annual basis.

For the other three plants, the last of which closed in 1993, methods comparable to the Tier 1 method in the 2006 IPCC Guidelines were used. Emissions from these three plants have been calculated using the recommended emission factor for unoptimized plants operating before 1995 (0.04 kg HCFC-23/kg HCFC-22 produced).

The five plants that have operated since 1994 measure (or, for the plants that have since closed, measured) concentrations of HFC-23 as well as mass flow rates of process streams to estimate their generation of HFC-23. Plants using thermal oxidation to abate their HFC-23 emissions monitor the performance of their oxidizers to verify that the HFC-23 is almost completely destroyed. One plant that releases a small fraction of its byproduct HFC-23 periodically measures HFC-23 concentrations at process vents using gas chromatography. This information is combined with information on quantities of products (e.g., HCFC-22) to estimate HFC-23 emissions.

To estimate 1990 through 2009 emissions, reports from an industry association were used that aggregated HCFC-22 production and HFC-23 emissions from all U.S. HCFC-22 producers and reported them to EPA (ARAP 1997, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, and 2010). To estimate 2010 through 2021

emissions, facility-level data (including both HCFC-22 production and HFC-23 emissions) reported through EPA's GHGRP were analyzed. In 1997 and 2008, comprehensive reviews of plant-level estimates of HFC-23 emissions and HCFC-22 production were performed (RTI 1997; RTI 2008). The 1997 and 2008 reviews enabled U.S. totals to be reviewed, updated, and where necessary, corrected, and also for plant-level uncertainty analyses (Monte-Carlo simulations) to be performed for 1990, 1995, 2000, 2005, and 2006. Estimates of annual U.S. HCFC-22 production are presented in Table 4-59.

Table 4-59: HCFC-22 Production (kt)

Year	1990	2005	2012	2017	2018	2019	2020	2021
Production	139	156	96	С	С	С	С	С

C (CBI)

Note: HCFC-22 production in 2013 through 2021 is considered Confidential Business Information (CBI) as there were only two producers of HCFC-22 in those years.

Uncertainty

The uncertainty analysis presented in this section was based on a plant-level Monte Carlo Stochastic Simulation for 2006. The Monte Carlo analysis used estimates of the uncertainties in the individual variables in each plant's estimating procedure. This analysis was based on the generation of 10,000 random samples of model inputs from the probability density functions for each input. A normal probability density function was assumed for all measurements and biases except the equipment leak estimates for one plant; a log-normal probability density function was used for this plant's equipment leak estimates. The simulation for 2006 yielded a 95-percent confidence interval for U.S. emissions of 6.8 percent below to 9.6 percent above the reported total.

The relative errors yielded by the Monte Carlo Stochastic Simulation for 2006 were applied to the U.S. emission estimate for 2021. The resulting estimates of absolute uncertainty are likely to be reasonably accurate because (1) the methods used by the two remaining plants to estimate their emissions are not believed to have changed significantly since 2006, and (2) although the distribution of emissions among the plants has changed between 2006 and 2021 (because one plant has closed), the plant that currently accounts for most emissions had a relative uncertainty in its 2006 (as well as 2005) emissions estimate that was similar to the relative uncertainty for total U.S. emissions. Thus, the closure of one plant is not likely to have a large impact on the uncertainty of the national emission estimate.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-60. HFC-23 emissions from HCFC-22 production were estimated to be between 2.1 and 2.5 MMT CO2 Eq. at the 95 percent confidence level. This indicates a range of approximately 7 percent below and 10 percent above the emission estimate of 2.2 MMT CO₂ Eq.

Table 4-60: Approach 2 Quantitative Uncertainty Estimates for HFC-23 Emissions from **HCFC-22 Production (MMT CO₂ Eq. and Percent)**

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Est				
Source	Gas	(MMT CO₂ Eq.)		CO₂ Eq.)	(%)		
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	
HCFC-22 Production	HFC-23	2.2	2.1	2.5	-7%	+10%	

^a Range of emissions reflects a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the

introduction of the IPPU chapter (see Annex 8 for more details). Under the GHGRP, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). ⁴⁹ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

The GHGRP also requires source-specific quality control measures for the HCFC-22 Production category. Under EPA's GHGRP, HCFC-22 producers are required to (1) measure concentrations of HFC-23 and HCFC-22 in the product stream at least weekly using equipment and methods (e.g., gas chromatography) with an accuracy and precision of 5 percent or better at the concentrations of the process samples, (2) measure mass flows of HFC-23 and HCFC-22 at least weekly using measurement devices (e.g., flowmeters) with an accuracy and precision of 1 percent of full scale or better, (3) calibrate mass measurement devices at the frequency recommended by the manufacturer using traceable standards and suitable methods published by a consensus standards organization, (4) calibrate gas chromatographs at least monthly through analysis of certified standards, and (5) document these calibrations.

Recalculations

For the current Inventory, the CO₂-equivalent estimates of total HFC-23 emissions from HCFC-22 production have been revised to reflect the 100-year global warming potential (GWP) for HFC-23 provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWP has been applied across the entire time series for consistency. With this change, the GWP of HFC-23 has decreased from 14,800 to 12,400, leading to a decrease of 16 percent in CO₂-equivalent HFC-23 emissions in every year compared to the previous inventory. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

4.15 Carbon Dioxide Consumption (CRF Source Category 2B10)

Carbon dioxide (CO₂) is used for a variety of commercial applications, including food processing, chemical production, carbonated beverage production, and refrigeration, and is also used in petroleum production for enhanced oil recovery (EOR). CO2 used for EOR is injected underground to enable additional petroleum to be produced. For the purposes of this analysis, CO2 used in food and beverage applications is assumed to be emitted to the atmosphere. A further discussion of CO2 used in EOR is described in the Energy chapter in Box 3-6 titled "Carbon Dioxide Transport, Injection, and Geological Storage" and is not included in this section.

Carbon dioxide is produced from naturally-occurring CO₂ reservoirs, as a byproduct from the energy and industrial production processes (e.g., ammonia production, fossil fuel combustion, ethanol production), and as a byproduct from the production of crude oil and natural gas, which contain naturally occurring CO2 as a component.

⁴⁹ EPA (2015). Greenhouse Gas Reporting Program Report Verification. Available online at: https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

In 2021, the amount of CO_2 produced and captured for commercial applications and subsequently emitted to the atmosphere was 5.0 MMT CO_2 Eq. (4,990 kt) (see Table 4-61 and Table 4-62). This is less than a 1 percent increase (20 kt) from 2020 levels and is an increase of approximately 239 percent since 1990.

Table 4-61: CO₂ Emissions from CO₂ Consumption (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
CO ₂ Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0

Table 4-62: CO₂ Emissions from CO₂ Consumption (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
CO ₂ Consumption	1,472	1,375	4,580	4,130	4,870	4,970	4,990

Methodology and Time-Series Consistency

Carbon dioxide emission estimates for 1990 through 2021 utilize a country-specific method and were based on the quantity of CO₂ extracted and transferred for industrial applications (i.e., non-EOR end-uses). Some of the CO₂ produced by these facilities is used for EOR, and some is used in other commercial applications (e.g., chemical manufacturing, food and beverage).

2010 through 2021

For 2010 through 2021, data from EPA's GHGRP (Subpart PP) were aggregated from facility-level reports to develop a national-level estimate for use in the Inventory (EPA 2022). Facilities report CO₂ extracted or produced from natural reservoirs and industrial sites, and CO₂ captured from energy and industrial processes and transferred to various end-use applications to EPA's GHGRP. This analysis includes only reported CO₂ transferred to food and beverage end-uses. EPA is continuing to analyze and assess integration of CO₂ transferred to other end-uses to enhance the completeness of estimates under this source category. Other end-uses include industrial applications, such as metal fabrication. EPA is analyzing the information reported to ensure that other end-use data excludes non-emissive applications and publication will not reveal CBI. Additionally, a small amount of CO₂ is used as a refrigerant; use and emissions from this application are reported under Section 4.24 Substitution of Ozone Depleting Substances (CRF Source Category 2F). Reporters subject to EPA's GHGRP Subpart PP are also required to report the quantity of CO₂ that is imported and/or exported. Currently, these data are not publicly available through the GHGRP due to data confidentiality reasons and hence are excluded from this analysis.

Facilities subject to Subpart PP of EPA's GHGRP are required to measure CO₂ extracted or produced. More details on the calculation and monitoring methods applicable to extraction and production facilities can be found under Subpart PP: Suppliers of Carbon Dioxide of the regulation, Part 98. The number of facilities that reported data to EPA's GHGRP Subpart PP (Suppliers of Carbon Dioxide) for 2010 through 2021 is much higher (ranging from 44 to 53) than the number of facilities included in the Inventory for the 1990 to 2009 time period prior to the availability of GHGRP data (4 facilities). The difference is largely due to the fact the 1990 to 2009 data includes only CO₂ transferred to end-use applications from naturally occurring CO₂ reservoirs and excludes industrial sites.

1990 through 2009

For 1990 through 2009, data from EPA's GHGRP are not available. For this time period, CO₂ production data from four naturally-occurring CO₂ reservoirs were used to estimate annual CO₂ emissions. These facilities were Jackson

⁵⁰ See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

Dome in Mississippi, Bravo and West Bravo Domes in New Mexico, and McCallum Dome in Colorado. The facilities in Mississippi and New Mexico produced CO₂ for use in both EOR and in other commercial applications (e.g., chemical manufacturing, food production). The fourth facility in Colorado (McCallum Dome) produced CO₂ for commercial applications only (New Mexico Bureau of Geology and Mineral Resources 2006).

Carbon dioxide production data and the percentage of production that was used for non-EOR applications for the Jackson Dome, Mississippi facility were obtained from Advanced Resources International (ARI 2006, 2007) for 1990 to 2000, and from the Annual Reports of Denbury Resources (Denbury Resources 2002 through 2010) for 2001 to 2009 (see Table 4-63). Denbury Resources reported the average CO₂ production in units of MMCF CO₂ per day for 2001 through 2009 and reported the percentage of the total average annual production that was used for EOR. Production from 1990 to 1999 was set equal to 2000 production, due to lack of publicly available production data for 1990 through 1999. Carbon dioxide production data for the Bravo Dome and West Bravo Dome were obtained from ARI for 1990 through 2009 (ARI 1990 to 2010). Data for the West Bravo Dome facility were only available for 2009. The percentage of total production that was used for non-EOR applications for the Bravo Dome and West Bravo Dome facilities for 1990 through 2009 were obtained from New Mexico Bureau of Geology and Mineral Resources (Broadhead 2003; New Mexico Bureau of Geology and Mineral Resources 2006). Production data for the McCallum Dome (Jackson County), Colorado facility were obtained from the Colorado Oil and Gas Conservation Commission (COGCC) for 1999 through 2009 (COGCC 2014). Production data for 1990 to 1998 and percentage of production used for EOR were assumed to be the same as for 1999, due to lack of publicly available data.

Table 4-63: CO₂ Production (kt CO₂) and the Percent Used for Non-EOR Applications

Year	Jackson Dome, MS CO ₂ Production (kt) (% Non-EOR)	Bravo Dome, NM CO ₂ Production (kt) (% Non-EOR)	West Bravo Dome, NM CO ₂ Production (kt) (% Non-EOR)	McCallum Dome, CO CO₂ Production (kt) (% Non-EOR)	Total CO ₂ Production from Extraction and Capture Facilities (kt)	% Non- EOR ^a
1990	1,344 (100%)	63 (1%)	+	65 (100%)	NE	NE
2005	1,254 (27%)	58 (1%)	+	63 (100%)	NE	NE
2017	IE	IE	IE	IE	59,900 ^b	8%
2018	IE	IE	IE	IE	58,400 ^b	7%
2019	IE	IE	IE	IE	61,300 ^b	8%
2020	IE	IE	IE	IE	44,700 ^b	11%
2021	IE	IE	IE	IE	43,980 ^b	11%

⁺ Does not exceed 0.5 percent.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for CO₂ consumption spliced activity data from two different sources: Industry data for 1990 through 2009 and GHGRP data starting in 2010. Consistent with the 2006 IPCC Guidelines, the overlap technique was applied to compare the two data dets for years where there was overlap. The data sets were determined to be inconsistent; the GHGRP data include CO₂ from industrial sources while the industry data do not. No adjustments were made to the activity data for 1990 through 2009 because the 2006 IPCC Guidelines indicate that it is not good practice to use the overlap technique when the data sets are inconsistent.

NE (Not Estimated)

IE (Included Elsewhere)

^a Includes only food and beverage applications.

^b For 2010 through 2021, the publicly available GHGRP data were aggregated at the national level based on GHGRP CBI criteria. The Dome-specific CO₂ production values are accounted for (i.e. included elsewhere) in the Total CO₂ Production from Extraction and Capture Facilities values starting in 2010 and are not able to be disaggregated.

Uncertainty

There is uncertainty associated with the data reported through EPA's GHGRP. Specifically, there is uncertainty associated with the amount of CO₂ consumed for food and beverage applications, given the GHGRP does have provisions that Subpart PP reporters are not required to report to the GHGRP if their emissions fall below certain thresholds, in addition to the exclusion of the amount of CO₂ transferred to all other end-use categories. This latter category might include CO₂ quantities that are being used for non-EOR industrial applications such as firefighting. Second, uncertainty is associated with the exclusion of imports/exports data for CO₂ suppliers. Currently these data are not publicly available through EPA's GHGRP and hence are excluded from this analysis. EPA verifies annual facility-level reports through a multi-step process (e.g., combination of electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. Si Given the lack of specific uncertainty ranges available on the data used, EPA uses an uncertainty range of ±5 percent for CO₂ consumed for food and beverage applications. The uncertainty range is derived from the default range for solvent use in Section 5.5 of Chapter 3 of the 2006 IPCC Guidelines. These values are representative of CO₂ used in food and beverage based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-64. Carbon dioxide consumption CO_2 emissions for 2021 were estimated to be between 4.7 and 5.2 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 5 percent below to 5 percent above the emission estimate of 5.0 MMT CO_2 Eq.

Table 4-64: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from CO₂ Consumption (MMT CO₂ Eq. and Percent)

Carriag	Coo	2021 Emission Estimate	Uncertainty	Range Relative	to Emission	Estimatea
Source	Gas	(MMT CO ₂ Eq.)	(MMT C	O ₂ Eq.)	(%)	
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
CO ₂ Consumption	CO ₂	5.0	4.7	5.2	-5%	+5%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details). More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to CO₂ Consumption can be found under Subpart PP (Suppliers of Carbon Dioxide) of the regulation (40 CFR Part 98). ⁵² EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). ⁵³ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

 $^{^{51}\,\}text{See}\,\,\text{h}\underline{\text{ttps://www.epa.gov/sites/production/files/2015-07/documents/ghgrp}\,\,\,\text{verification}\,\,\,\text{factsheet.pdf.}$

⁵² See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98 main 02.tpl.

⁵³See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

Planned Improvements

EPA will continue to evaluate the potential to include additional GHGRP data on other emissive end-uses to improve the accuracy and completeness of estimates for this source category. Particular attention will be made to ensuring time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon. 54

These improvements are still in process and will be incorporated into future Inventory reports. These are near-to medium-term improvements.

Phosphoric Acid Production (CRF Source Category 2B10)

Phosphoric acid (H₃PO₄) is a basic raw material used in the production of phosphate-based fertilizers. Phosphoric acid production from natural phosphate rock is a source of carbon dioxide (CO2) emissions, due to the chemical reaction of the inorganic carbon (calcium carbonate) component of the phosphate rock.

Phosphate rock is mined in Florida and North Carolina, which account for more than 75 percent of total domestic output, and in Idaho and Utah (USGS 2022). It is used primarily as a raw material for wet-process phosphoric acid production. The composition of natural phosphate rock varies, depending on the location where it is mined. Natural phosphate rock mined in the United States generally contains inorganic carbon in the form of calcium carbonate (limestone) and may also contain organic carbon.

The phosphoric acid production process involves chemical reaction of the calcium phosphate (Ca₃(PO₄)₂) component of the phosphate rock with sulfuric acid (H₂SO4) and recirculated phosphoric acid (H₃PO4) (EFMA 2000). The generation of CO₂, however, is due to the associated limestone-sulfuric acid reaction, as shown below:

$$CaCO_3 + H_2SO_4 + H_2O \rightarrow CaSO_4 \cdot 2H_2O + CO_2$$

Total U.S. phosphate rock production in 2021 was an estimated 23.0 million metric tons (USGS 2022). Total imports of phosphate rock to the United States in 2021 were 2.4 million metric tons (USGS 2022). Between 2017 and 2020, most of the imported phosphate rock (87 percent) came from Peru, with 13 percent from Morocco (USGS 2022). All phosphate rock mining companies in the United States are vertically integrated with fertilizer plants that produce phosphoric acid located near the mines. The phosphoric acid production facilities that use imported phosphate rock are located in Louisiana.

Between 1990 and 2021, domestic phosphate rock production decreased by nearly 54 percent. Total CO2 emissions from phosphoric acid production were 0.9 MMT CO₂ Eq. (909 kt CO₂) in 2021 (see Table 4-65 and Table 4-66). Domestic consumption of phosphate rock in 2021 was estimated to have decreased 1 percent relative to

⁵⁴ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

2020 levels. The COVID-19 pandemic did not impact the domestic phosphate rock market as both the fertilizer industry and related agricultural businesses were considered essential industries and were unaffected by pandemic "stay-at-home" orders issued in March 2020 (USGS 2021a).

Table 4-65: CO₂ Emissions from Phosphoric Acid Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9

Table 4-66: CO₂ Emissions from Phosphoric Acid Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Phosphoric Acid Production	1,529	1,342	1,025	937	909	901	909

Methodology and Time-Series Consistency

The United States uses a country-specific methodology consistent with an IPCC Tier 1 approach to calculate emissions from production of phosphoric acid from phosphate rock.⁵⁵ Carbon dioxide emissions from production of phosphoric acid from phosphate rock are estimated by multiplying the average amount of inorganic carbon (expressed as CO₂) contained in the natural phosphate rock as calcium carbonate by the amount of phosphate rock that is used annually to produce phosphoric acid, accounting for domestic production and net imports for consumption. The estimation methodology is as follows:

Equation 4-9: CO₂ Emissions from Phosphoric Acid Production

$$E_{pa} = C_{pr} \times Q_{pr}$$

where,

CO₂ emissions from phosphoric acid production, metric tons Epa

Average amount of carbon (expressed as CO₂) in natural phosphate rock, metric ton C_{pr}

CO₂/ metric ton phosphate rock

Quantity of phosphate rock used to produce phosphoric acid Qpr

The CO₂ emissions calculation methodology assumes that all of the inorganic C (calcium carbonate) content of the phosphate rock reacts to produce CO₂ in the phosphoric acid production process and is emitted with the stack gas. The methodology also assumes that none of the organic C content of the phosphate rock is converted to CO₂ and that all of the organic C content remains in the phosphoric acid product.

From 1993 to 2004, the U.S. Geological Survey (USGS) Mineral Yearbook: Phosphate Rock disaggregated phosphate rock mined annually in Florida and North Carolina from phosphate rock mined annually in Idaho and Utah, and reported the annual amounts of phosphate rock exported and imported for consumption (see Table 4-67). For the years 1990 through 1992, and 2005 through 2021, only nationally aggregated mining data was reported by USGS. For the years 1990, 1991, and 1992, the breakdown of phosphate rock mined in Florida and North Carolina and the amount mined in Idaho and Utah are approximated using data reported by USGS for the average share of U.S. production in those states from 1993 to 2004. For the years 2005 through 2021, the same approximation method is used, but the share of U.S. production was assumed to be consistent with the ratio of production capacity in those states, which were obtained from the USGS commodity specialist for phosphate rock (USGS 2012; USGS 2021b). For 1990 through 2021, data on U.S. domestic consumption of phosphate rock, consisting of domestic reported sales and use of phosphate rock, exports of phosphate rock (primarily from Florida and North Carolina),

⁵⁵ The *2006 IPCC Guidelines* do not provide a method for estimating process emissions (CO₂) from Phosphoric Acid Production.

and imports of phosphate rock for consumption, were obtained from USGS Minerals Yearbook: Phosphate Rock (USGS 1994 through 2015b) and from USGS Minerals Commodity Summaries: Phosphate Rock (USGS 2016 through 2021a, 2022). From 2004 through 2021, the USGS reported no exports of phosphate rock from U.S. producers (USGS 2022).

The carbonate content of phosphate rock varies depending upon where the material is mined. Composition data for domestically mined and imported phosphate rock were provided by the Florida Institute of Phosphate Research, now known as the Florida Industrial and Phosphate Research Institute (FIPR 2003a). Phosphate rock mined in Florida contains approximately 1 percent inorganic C, and phosphate rock imported from Morocco contains approximately 1.46 percent inorganic C. Calcined phosphate rock mined in North Carolina and Idaho contains approximately 0.41 percent and 0.27 percent inorganic C, respectively (see Table 4-67). Similar to the phosphate rock mined in Morocco, phosphate rock mined in Peru contains approximately 5 percent CO₂ (Golder Associates and M3 Engineering 2016).

Carbonate content data for phosphate rock mined in Florida are used to calculate the CO2 emissions from consumption of phosphate rock mined in Florida and North Carolina (more than 75 percent of domestic production), and carbonate content data for phosphate rock mined in Morocco and Peru are used to calculate CO2 emissions from consumption of imported phosphate rock. The CO₂ emissions calculation assumes that all of the domestic production of phosphate rock is used in uncalcined form. As of 2006, the USGS noted that one phosphate rock producer in Idaho produces calcined phosphate rock; however, no production data were available for this single producer (USGS 2006). The USGS confirmed that no significant quantity of domestic production of phosphate rock is in the calcined form (USGS 2012).

Table 4-67: Phosphate Rock Domestic Consumption, Exports, and Imports (kt)

Location/Year	1990	2005	2017	2018	2019	2020	2021
U.S. Domestic Consumptiona	49,800	35,200	26,300	23,300	23,400	22,600	23,000
FL and NC	42,494	28,160	20,510	18,170	18,250	17,630	17,940
ID and UT	7,306	7,040	5,790	5,130	5,150	4,970	5,060
Exports—FL and NC	6,240	0	0	0	0	0	0
Imports	451	2,630	2,470	2,770	2,140	2,520	2,400
Total U.S. Consumption	44,011	37,830	28,770	26,070	25,540	25,120	25,400

^a U.S. domestic consumption values are based on reported phosphate rock sold or used by producers. Note: Totals may not sum due to independent rounding.

Table 4-68: Chemical Composition of Phosphate Rock (Percent by Weight)

			North			
Composition	Central Florida	North Florida	Carolina (calcined)	Idaho (calcined)	Morocco	Peru
Total Carbon (as C)	1.60	1.76	0.76	0.60	1.56	NA
Inorganic Carbon (as C)	1.00	0.93	0.41	0.27	1.46	NA
Organic Carbon (as C)	0.60	0.83	0.35	0.00	0.10	NA
Inorganic Carbon (as CO ₂)	3.67	3.43	1.50	1.00	5.00	5.00

NA (Not Available)

Sources: FIPR (2003a), Golder Associates and M3 Engineering (2016)

Methodological approaches were applied to the entire time series to ensure consistency in emissions estimates from 1990 through 2021.

Uncertainty

Phosphate rock production data used in the emission calculations were developed by the USGS through monthly and semiannual voluntary surveys of the active phosphate rock mines during 2021. Prior to 2006, USGS provided the data disaggregated regionally; however, beginning in 2006, only total U.S. phosphate rock production was reported. Regional production for 2021 was estimated based on regional production data from 2017 to 2020 and multiplied by regionally-specific emission factors. There is uncertainty associated with the degree to which the estimated 2021 regional production data represents actual production in those regions. Total U.S. phosphate rock production data are not considered to be a significant source of uncertainty because all the domestic phosphate rock producers report their annual production to the USGS. Data for exports of phosphate rock used in the emission calculations are reported to the USGS by phosphate rock producers and are not considered to be a significant source of uncertainty. Data for imports for consumption are based on international trade data collected by the U.S. Census Bureau. These U.S. government economic data are not considered to be a significant source of uncertainty. Based on expert judgement of the USGS, EPA assigned an uncertainty range of ±5 percent to the percentage of phosphate rock produced from Florida and North Carolina, and ±5 percent to phosphoric acid production and imports, based on expert judgment (Jasinki 2012).

An additional source of uncertainty in the calculation of CO₂ emissions from phosphoric acid production is the carbonate composition of phosphate rock, as the composition of phosphate rock varies depending upon where the material is mined and may also vary over time. The Inventory relies on one study (FIPR 2003a) of chemical composition of the phosphate rock; limited data are available beyond this study. Another source of uncertainty is the disposition of the organic carbon content of the phosphate rock. A representative of FIPR indicated that in the phosphoric acid production process, the organic C content of the mined phosphate rock generally remains in the phosphoric acid product, which is what produces the color of the phosphoric acid product (FIPR 2003b). Organic carbon is therefore not included in the calculation of CO₂ emissions from phosphoric acid production.

A third source of uncertainty is the assumption that all domestically-produced phosphate rock is used in phosphoric acid production and used without first being calcined. Calcination of the phosphate rock would result in conversion of some of the organic C in the phosphate rock into CO₂; however, according to air permit information available to the public, at least one facility has calcining units permitted for operation (NCDENR 2013).

Finally, USGS indicated that in 2021 less than 5 percent of domestically-produced phosphate rock was used to manufacture elemental phosphorus and other phosphorus-based chemicals, rather than phosphoric acid (USGS 2022). According to USGS, there is only one domestic producer of elemental phosphorus, in Idaho, and no data were available concerning the annual production of this single producer. Elemental phosphorus is produced by reducing phosphate rock with coal coke, and it is therefore assumed that 100 percent of the carbonate content of the phosphate rock will be converted to CO_2 in the elemental phosphorus production process. The calculation for CO_2 emissions assumes that phosphate rock consumption, for purposes other than phosphoric acid production, results in CO_2 emissions from 100 percent of the inorganic carbon content in phosphate rock, but none from the organic carbon content.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-69. 2021 phosphoric acid production CO_2 emissions were estimated to be between 0.8 and 1.1 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 18 percent below and 20 percent above the emission estimate of 0.9 MMT CO_2 Eq.

Table 4-69: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Phosphoric Acid Production (MMT CO₂ Eq. and Percent)

Source	C	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimatea					
Source	Gas	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Phosphoric Acid Production	CO ₂	0.9	0.8	1.1	-18%	+20%		

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

Recalculations were performed for 2020 to reflect an updated value for the total U.S. production of phosphate rock based on updated USGS data. This update resulted in a decrease of 37 kt CO2 in 2020.

Planned Improvements

EPA continues to evaluate potential improvements to the Inventory estimates for this source category, which include direct integration of EPA's GHGRP data for 2010 through 2021 along with assessing applicability of reported GHGRP data to update the inorganic C content of phosphate rock for prior years to ensure time-series consistency. Specifically, EPA would need to assess that averaged inorganic C content data (by region or other approaches) meets GHGRP confidential business information (CBI) screening criteria. EPA would then need to assess the applicability of GHGRP data for the averaged inorganic C content (by region or other approaches) from 2010 through 2021, along with other information to inform estimates in prior years in the required time series (1990 through 2009) based on the sources of phosphate rock used in production of phosphoric acid over time. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon. ⁵⁶ These long-term planned improvements are still in development by EPA and have not been implemented into the current Inventory report.

Iron and Steel Production (CRF Source Category 2C1) and Metallurgical Coke **Production**

Iron and steel production is a multi-step process that generates process-related emissions of carbon dioxide (CO₂) and methane (CH₄) as raw materials are refined into iron and then transformed into crude steel. Emissions from conventional fuels (e.g., natural gas, fuel oil) consumed for energy purposes during the production of iron and steel are accounted for in the Energy chapter.

Iron and steel production includes seven distinct production processes: metallurgical coke production, sinter production, direct reduced iron (DRI) production, pellet production, pig iron⁵⁷ production, electric arc furnace (EAF) steel production, and basic oxygen furnace (BOF) steel production. The number of production processes at a

Industrial Processes and Product Uses 4-81

⁵⁶ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

⁵⁷ Pig iron is the common industry term to describe what should technically be called crude iron. Pig iron is a subset of crude iron that has lost popularity over time as industry trends have shifted. Throughout this report, pig iron will be used interchangeably with crude iron, but it should be noted that in other data sets or reports pig iron and crude iron may not be used interchangeably and may provide different values.

particular plant is dependent upon the specific plant configuration. Most process CO₂ generated from the iron and steel industry is a result of the production of crude iron.

In addition to the production processes mentioned above, CO₂ is also generated at iron and steel mills through the consumption of process byproducts (e.g., blast furnace gas, coke oven gas) used for various purposes including heating, annealing, and electricity generation. Process byproducts sold off-site for use as synthetic natural gas are also accounted for in these calculations. In general, CO₂ emissions are generated in these production processes through the reduction and consumption of various carbon-containing inputs (e.g., ore, scrap, flux, coke byproducts). Fugitive CH₄ emissions can also be generated from these processes, as well as from sinter, direct iron, and pellet production.

In 2021, approximately eleven integrated iron and steel steelmaking facilities utilized BOFs to refine and produce steel from iron, and raw steel was produced at 101 facilities across the United States. Approximately 29 percent of steel production was attributed to BOFs and 71 percent to EAFs (USGS 2022). The trend in the United States for integrated facilities has been a shift towards fewer BOFs and more EAFs. EAFs use scrap steel as their main input and use significantly less energy than BOFs. There are also 14 cokemaking facilities, of which 3 facilities are colocated with integrated iron and steel facilities (ACCCI 2021). In the United States, 6 states account for roughly 52 percent of total raw steel production: Indiana, Alabama, Tennessee, Kentucky, Mississippi, and Arkansas (AISI 2022).

Total annual production of crude steel in the United States was fairly constant between 2000 and 2008 and ranged from a low of 99,320,000 tons to a high of 109,880,000 tons (2001 and 2004, respectively). Due to the decrease in demand caused by the global economic downturn (particularly from the automotive industry), crude steel production in the United States sharply decreased to 65,459,000 tons in 2009. Crude steel production was fairly constant from 2011 through 2014, and after a dip in production from 2014 to 2015, crude steel production has slowly and steadily increased for the past few years. Crude steel production dipped again in 2020 due to the COVID-19 pandemic and increased close to pre-pandemic levels in 2021. The United States was the fourth largest producer of raw steel in the world, behind China, India and Japan, accounting for approximately 4.4 percent of world production in 2021 (AISI 2004 through 2022).

The majority of CO_2 emissions from the iron and steel production process come from the use of metallurgical coke in the production of pig iron and from the consumption of other process byproducts, with lesser amounts emitted from the use of carbon-containing flux and from the removal of carbon from pig iron used to produce steel.

According to the 2006 IPCC Guidelines, the production of metallurgical coke from coking coal is considered to be an energy use of fossil fuel, and the use of coke in iron and steel production is considered to be an industrial process source. The 2006 IPCC Guidelines suggest that emissions from the production of metallurgical coke should be reported separately in the Energy sector, while emissions from coke consumption in iron and steel production should be reported in the Industrial Processes and Product Use sector. The approaches and emission estimates for both metallurgical coke production and iron and steel production, however, are presented here because much of the relevant activity data is used to estimate emissions from both metallurgical coke production and iron and steel production. For example, some byproducts (e.g., coke oven gas) of the metallurgical coke production process are consumed during iron and steel production, and some byproducts of the iron and steel production process (e.g., blast furnace gas) are consumed during metallurgical coke production. Emissions associated with the consumption of these byproducts are attributed at the point of consumption. Emissions associated with the use of conventional fuels (e.g., natural gas, fuel oil) for electricity generation, heating and annealing, or other miscellaneous purposes downstream of the iron and steelmaking furnaces are reported in the Energy chapter.

Metallurgical Coke Production

Emissions of CO₂ from metallurgical coke production in 2021 were 3.2 MMT CO₂ Eq. (3,224 kt CO₂) (see Table 4-70 and Table 4-71). Emissions increased by 39 percent from 2020 to 2021 and have decreased by 43 percent since

1990. Coke production in 2021 was about 21 percent higher than in 2020 and 55 percent below 1990 (EIA 2022, AISI 2022).

Significant activity data for 2021 and 2020 were not available in time for publication of this report due to industry consolidation that impacts the publication of data without revealing confidential business information. Activity data for these years were estimated using 2019 values adjusted based on GHGRP emissions data, as described in the Methodology and Time-Series Consistency section below.

Table 4-70: CO₂ Emissions from Metallurgical Coke Production (MMT CO₂ Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	5.6	3.9	2.0	1.3	3.0	2.3	3.2

Table 4-71: CO₂ Emissions from Metallurgical Coke Production (kt CO₂)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	5,608	3,921	1,978	1,282	3,006	2,325	3,224

Iron and Steel Production

Emissions of CO₂ and CH₄ from iron and steel production in 2021 were 38.4 MMT CO₂ Eq. (38,432 kt) and 0.0082 MMT CO₂ Eq. (0.3 kt CH₄), respectively (see Table 4-72 through Table 4-75). Emissions from iron and steel production increased by 9 percent from 2020 to 2021 and have decreased by 61 percent since 1990, due to restructuring of the industry, technological improvements, and increased scrap steel utilization. Carbon dioxide emission estimates include emissions from the consumption of carbonaceous materials in the blast furnace, EAF, and BOF, as well as blast furnace gas and coke oven gas consumption for other activities at the steel mill.

Significant activity data for 2021 and 2020 were not available in time for publication of this report due to industry consolidation that impacts the publication of data without revealing confidential business information. Activity data for these years were estimated using 2019 values adjusted based on GHGRP emissions data, as described in the Methodology and Time-Series Consistency section below.

In 2021, domestic production of pig iron increased by 21 percent from 2020 levels. Overall, domestic pig iron production has declined since the 1990s; pig iron production in 2021 was 54 percent lower than in 2000 and 55 percent below 1990. Carbon dioxide emissions from iron production have decreased by 80 percent (36.6 MMT CO2 Eq.) since 1990. Carbon dioxide emissions from steel production have decreased by 31 percent (2.4 MMT CO₂ Eq.) since 1990, while overall CO2 emissions from iron and steel production have declined by 61 percent (60.7 MMT CO₂ Eq.) from 1990 to 2021.

Table 4-72: CO₂ Emissions from Iron and Steel Production (MMT CO₂ Eq.)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	2.4	1.7	0.9	0.9	0.9	0.7	0.8
Iron Production	45.7	17.7	8.2	9.6	9.4	8.4	9.1
Pellet Production	1.8	1.5	0.9	0.9	0.9	0.8	0.8
Steel Production	8.0	9.4	6.5	6.0	5.8	5.7	5.5
Other Activities ^a	41.2	35.9	22.4	24.1	23.2	19.8	22.1
Total	99.1	66.2	38.8	41.6	40.1	35.4	38.4

a Includes emissions from blast furnace gas and coke oven gas combustion for activities at the steel mill other than consumption in blast furnace, EAFs, or BOFs.

Note: Totals may not sum due to independent rounding.

Table 4-73: CO₂ Emissions from Iron and Steel Production (kt)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	2,448	1,663	869	937	876	749	836
Iron Production	45,706	17,661	8,234	9,583	9,360	8,409	9,121
Pellet Production	1,817	1,503	867	924	878	751	838
Steel Production	7,964	9,395	6,465	5,982	5,812	5,657	5,517
Other Activities a	41,194	35,934	22,396	24,149	23,158	19,820	22,119
Total	99,129	66,156	38,832	41,576	40,084	35,387	38,432

^a Includes emissions from blast furnace gas and coke oven gas combustion for activities at the steel mill other than consumption in blast furnace, EAFs, or BOFs.

Note: Totals may not sum due to independent rounding.

Table 4-74: CH₄ Emissions from Iron and Steel Production (MMT CO₂ Eq.)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	+	+	+	+	+	+	+

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Table 4-75: CH₄ Emissions from Iron and Steel Production (kt)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	0.9	0.6	+	+	+	+	+

⁺ Does not exceed 0.5 kt

Methodology and Time-Series Consistency

Emission estimates for metallurgical coke, EAF steel production, and BOF steel production presented in this chapter utilize a country-specific approach based on Tier 2 methodologies provided by the 2006 IPCC Guidelines. These Tier 2 methodologies call for a mass balance accounting of the carbonaceous inputs and outputs during the iron and steel production process and the metallurgical coke production process. Estimates for pig iron production apply Tier 2 methods consistent with the 2006 IPCC Guidelines. Tier 1 methods are used for certain iron and steel production processes (i.e., sinter production, pellet production and DRI production) for which available data are insufficient to apply a Tier 2 method (e.g., country-specific carbon contents of inputs and outputs are not known). The majority of emissions are captured with higher tier methods, as sinter production, pellet production, and DRI production only account for roughly 8 percent of total iron and steel production emissions.

The Tier 2 methodology equation is as follows:

Equation 4-10: CO₂ Emissions from Coke, Pig Iron, EAF Steel, and BOF Steel Production, based on 2006 IPCC Guidelines Tier 2 Methodologies

$$E_{CO_2} = \left[\sum_{a} (Q_a \times C_a) - \sum_{b} (Q_b \times C_b) \right] \times \frac{44}{12}$$

where,

E_{CO2} = Emissions from coke, pig iron, EAF steel, or BOF steel production, metric tons

a = Input material α b = Output material b

 Q_a = Quantity of input material α , metric tons

C_a = Carbon content of input material *a*, metric tons C/metric ton material

Q_b = Quantity of output material b, metric tons

C_b = Carbon content of output material *b*, metric tons C/metric ton material

44/12 = Stoichiometric ratio of CO_2 to C

The Tier 1 methodology equations are as follows:

Equation 4-11: 2006 IPCC Guidelines Tier 1: Emissions from Sinter, Direct Reduced Iron, and Pellet Production (Equations 4.6, 4.7, and 4.8)

$$E_{s,p} = Q_s \times EF_{s,p}$$

$$E_{d,CO2} = Q_d \times EF_{d,CO2}$$

$$E_{p,CO2} = Q_p \times EF_{p,CO2}$$

where,

 $E_{s,p}$ = Emissions from sinter production process for pollutant p (CO₂ or CH₄), metric ton

Q_s = Quantity of sinter produced, metric tons

 $EF_{s,p}$ = Emission factor for pollutant p (CO₂ or CH₄), metric ton p/metric ton sinter

E_{d,CO2} = Emissions from DRI production process for CO₂, metric ton

Q_d = Quantity of DRI produced, metric tons

EF_{d,CO2} = Emission factor for CO₂, metric ton CO₂/metric ton DRI

 $E_{p,CO2}$ = Emissions from pellet production process for CO_2 , metric ton

Qp = Quantity of pellets produced, metric tons

EF_{p,CO2} = Emission factor for CO₂, metric ton CO₂/metric ton pellets produced

A significant number of activity data that serve as inputs to emissions calculations were unavailable for 2021 and 2020 at the time of publication and were estimated using 2019 values. In addition, to account for the impacts of the COVID-19 pandemic in 2020, the EPA used process emissions data from the EPA's Greenhouse Gas Reporting Program (GHGRP) subpart Q for the iron and steel sector to adjust the estimated values for 2021 and 2020. GHGRP process emissions data decreased by approximately 14 percent from 2019 to 2020 and increased by approximately 12% from 2020 to 2021 (EPA 2022). These percentage changes were applied to 2019 activity data values to produce an estimate for 2021 and 2020 data.

Metallurgical Coke Production

Coking coal is used to manufacture metallurgical coke which is used primarily as a reducing agent in the production of iron and steel but is also used in the production of other metals including zinc and lead (see Zinc Production and Lead Production sections of this chapter). Emissions associated with producing metallurgical coke from coking coal are estimated and reported separately from emissions that result from the iron and steel production process. To estimate emissions from metallurgical coke production, a Tier 2 method provided by the 2006 IPCC Guidelines was utilized. The amount of carbon contained in materials produced during the metallurgical coke production process (i.e., coke, coke breeze and coke oven gas) is deducted from the amount of carbon contained in materials consumed during the metallurgical coke production process (i.e., natural gas, blast furnace gas, and coking coal). For calculations, activity data for these inputs, including natural gas, blast furnace gas, and coking coke consumed for metallurgical coke production, are in units consistent with the carbon content values. Light oil, which is produced during the metallurgical coke production process, is excluded from the deductions due to data limitations. The amount of carbon contained in these materials is calculated by multiplying the material-specific

carbon content by the amount of material consumed or produced (see Table 4-76). The amount of coal tar produced was approximated using a production factor of 0.03 tons of coal tar per ton of coking coal consumed. The amount of coke breeze produced was approximated using a production factor of 0.075 tons of coke breeze per ton of coking coal consumed (Steiner 2008; DOE 2000). Data on the consumption of carbonaceous materials (other than coking coal) as well as coke oven gas production were available for integrated steel mills only (i.e., steel mills with co-located coke plants); therefore, carbonaceous material (other than coking coal) consumption and coke oven gas production were excluded from emission estimates for merchant coke plants. Carbon contained in coke oven gas used for coke-oven underfiring was not included in the deductions to avoid double-counting.

Table 4-76: Material Carbon Contents for Metallurgical Coke Production

kg C/kg				
0.62				
0.83				
0.83				
0.75				
kg C/GJ				
12.1				
70.8				

^a Source: IPCC (2006), Vol. 3 Chapter 4, Table 4.3

Although the 2006 IPCC Guidelines provide a Tier 1 CH₄ emission factor for metallurgical coke production (i.e., 0.1 g CH₄ per metric ton of coke production), it is not appropriate to use because CO₂ emissions were estimated using the Tier 2 mass balance methodology. The mass balance methodology makes a basic assumption that all carbon that enters the metallurgical coke production process either exits the process as part of a carbon-containing output or as CO₂ emissions. This is consistent with a preliminary assessment of aggregated facility-level greenhouse gas CH₄ emissions reported by coke production facilities under EPA's GHGRP. The assessment indicates that CH₄ emissions from coke production are insignificant and below 500 kt or 0.05 percent of total national emissions. Pending resources and significance, EPA continues to assess the possibility of including these emissions in future Inventories to enhance completeness but has not incorporated these emissions into this report.

Data relating to the mass of coking coal consumed at metallurgical coke plants and the mass of metallurgical coke produced at coke plants were taken from the Energy Information Administration (EIA) *Quarterly Coal Report: October through December* (EIA 1998 through 2019) and EIA *Quarterly Coal Report: January through March* (EIA 2021 through 2022) (see Table 4-77). Data on the volume of natural gas consumption, blast furnace gas consumption, and coke oven gas production for metallurgical coke production at integrated steel mills were obtained from the American Iron and Steel Institute (AISI) *Annual Statistical* Report (AISI 2004 through 2022) and through personal communications with AISI (Steiner 2008) (see Table 4-78). These data from the AISI *Annual Statistical Report* were withheld for 2021 and 2020, so the 2019 values were used as estimated data for the missing 2021 and 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

The factor for the quantity of coal tar produced per ton of coking coal consumed was provided by AISI (Steiner 2008). The factor for the quantity of coke breeze produced per ton of coking coal consumed was obtained through Table 2-1 of the report *Energy and Environmental Profile of the U.S. Iron and Steel Industry* (DOE 2000). Data on natural gas consumption and coke oven gas production at merchant coke plants were not available and were excluded from the emission estimate. Carbon contents for metallurgical coke, coal tar, coke oven gas, and blast furnace gas were provided by the *2006 IPCC Guidelines*. The carbon content for coke breeze was assumed to equal the carbon content of coke. Carbon contents for coking coal was from EIA.

^b Source: EIA (2017b)

^c Source: IPCC (2006), Vol. 2 Chapter 1, Table 1.3

Table 4-77: Production and Consumption Data for the Calculation of CO₂ Emissions from **Metallurgical Coke Production (Thousand Metric Tons)**

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Metallurgical Coke Production							
Coking Coal Consumption at Coke Plants	35,269	21,259	15,910	16,635	16,261	13,076	15,957
Coke Production at Coke Plants	25,054	15,167	11,746	12,525	11,676	9,392	11,381
Coke Breeze Production	2,645	1,594	1,193	1,248	1,220	981	1,197
Coal Tar Production	1,058	638	477	499	488	392	479

Table 4-78: Production and Consumption Data for the Calculation of CO₂ Emissions from Metallurgical Coke Production (Million ft³)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Metallurgical Coke Production							
Coke Oven Gas Production	250,767	114,213	74,997	80,750	77,692	66,492	74,206
Natural Gas Consumption	599	2,996	2,103	2,275	2,189	1,873	2,091
Blast Furnace Gas Consumption	24,602	4,460	3,683	4,022	3,914	3,350	3,738

Iron and Steel Production

To estimate emissions from pig iron production in the blast furnace, the amount of carbon contained in the produced pig iron and blast furnace gas were deducted from the amount of carbon contained in inputs (i.e., metallurgical coke, sinter, natural ore, pellets, natural gas, fuel oil, coke oven gas, carbonate fluxes or slagging materials, and direct coal injection). For calculations, activity data for these inputs, including coke consumed for pig iron production, are in units consistent with the carbon content values. The carbon contained in the pig iron, blast furnace gas, and blast furnace inputs was estimated by multiplying the material-specific carbon content by each material type (see Table 4-79). In the absence of a default carbon content value from the 2006 IPCC Guidelines for pellet, sinter, or natural ore consumed for pig iron production, a country-specific approach based on Tier 2 methodology is used. Pellet, sinter, and natural ore used as an input for pig iron production is assumed to have the same carbon content as direct reduced iron (2 percent). Carbon in blast furnace gas used to pre-heat the blast furnace air is combusted to form CO2 during this process. Carbon contained in blast furnace gas used as a blast furnace input was not included in the deductions to avoid double-counting.

Emissions from steel production in EAFs were estimated by deducting the carbon contained in the steel produced from the carbon contained in the EAF anode, charge carbon, and scrap steel added to the EAF. Small amounts of carbon from DRI and pig iron to the EAFs were also included in the EAF calculation. For BOFs, estimates of carbon contained in BOF steel were deducted from carbon contained in inputs such as natural gas, coke oven gas, fluxes (i.e., limestone and dolomite), and pig iron. In each case, the carbon was calculated by multiplying material-specific carbon contents by each material type (see Table 4-79). For EAFs, the amount of EAF anode consumed was approximated by multiplying total EAF steel production by the amount of EAF anode consumed per metric ton of steel produced (0.002 metric tons EAF anode per metric ton steel produced [Steiner 2008]). The amount of carboncontaining flux (i.e., limestone and dolomite) used in EAF and BOF steel production was deducted from the "Other Process Uses of Carbonates" source category (CRF Source Category 2A4) to avoid double-counting.

Carbon dioxide emissions from the consumption of blast furnace gas and coke oven gas for other activities occurring at the steel mill were estimated by multiplying the amount of these materials consumed for these purposes by the material-specific carbon content (see Table 4-79).

Table 4-79: Material Carbon Contents for Iron and Steel Production

Material	kg C/kg

Coke	0.83
Direct Reduced Iron	0.02
Dolomite	0.13
EAF Carbon Electrodes	0.82
EAF Charge Carbon	0.83
Limestone	0.12
Pig Iron	0.04
Steel	0.01
Material	kg C/GJ
Coke Oven Gas	12.1
Blast Furnace Gas	70.8

Source: IPCC (2006), Table 4.3. Coke Oven Gas and

Blast Furnace Gas, Table 1.3.

Carbon dioxide emissions associated with sinter production, direct reduced iron production, pellet production, pig iron production, steel production, and other steel mill activities were summed to calculate the total CO₂ emissions from iron and steel production (see Table 4-72 and Table 4-73).

The sinter production process results in fugitive emissions of CH₄, which are emitted via leaks in the production equipment, rather than through the emission stacks or vents of the production plants. The fugitive emissions were calculated by applying Tier 1 emission factors taken from the 2006 IPCC Guidelines for sinter production (see Table 4-80). Although the 2006 IPCC Guidelines also provide a Tier 1 methodology for CH₄ emissions from pig iron production, it is not appropriate to use because CO₂ emissions for pig iron production are estimated using the Tier 2 mass balance methodology. The mass balance methodology makes a basic assumption that all carbon that enters the pig iron production process either exits the process as part of a carbon-containing output or as CO₂ emissions; the estimation of CH₄ emissions is precluded. Annual analysis of facility-level emissions reported during iron production further supports this assumption and indicates that CH₄ emissions are below 500 kt CO₂ Eq. and well below 0.05 percent of total national emissions. The production of direct reduced iron could also result in emissions of CH₄ through the consumption of fossil fuels (e.g., natural gas, etc.); however, these emission estimates are excluded due to data limitations. Pending further analysis and resources, EPA may include these emissions in future reports to enhance completeness. EPA is still assessing the possibility of including these emissions in future reports and have not included this data in the current report.

Table 4-80: CH₄ Emission Factors for Sinter and Pig Iron Production

Unit
kg CH ₄ /metric ton

Source: IPCC (2006), Table 4.2.

Emissions of CO₂ from sinter production, direct reduced iron production, and pellet production were estimated by multiplying total national sinter production, total national direct reduced iron production, and total national pellet production by Tier 1 CO₂ emission factors (see Table 4-81). Because estimates of sinter production, direct reduced iron production, and pellet production were not available, production was assumed to equal consumption.

Table 4-81: CO₂ Emission Factors for Sinter Production, Direct Reduced Iron Production, and **Pellet Production**

	Metric Ton CO₂/Metric
Material Produced	Ton
Sinter	0.2
Direct Reduced Iron	0.7
Pellet Production	0.03

Source: IPCC (2006), Table 4.1.

The consumption of coking coal, natural gas, distillate fuel, and coal used in iron and steel production are adjusted for within the Energy chapter to avoid double-counting of emissions reported within the IPPU chapter as these fuels were consumed during non-energy related activities. More information on this methodology and examples of adjustments made between the IPPU and Energy chapters are described in Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

Sinter consumption and pellet consumption data for 1990 through 2020 were obtained from AISI's Annual Statistical Report (AISI 2004 through 2022) and through personal communications with AISI (Steiner 2008) (see Table 4-82). These data from the AISI Annual Statistical Report were withheld for 2021 and 2020, so the 2019 values were used as estimated data for the missing 2021 and 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

In general, direct reduced iron (DRI) consumption data were obtained from the U.S. Geological Survey (USGS) Minerals Yearbook – Iron and Steel Scrap (USGS 1991 through 2020) and personal communication with the USGS Iron and Steel Commodity Specialist (Tuck 2023). Data for DRI consumed in EAFs were not available for the years 1990 and 1991. EAF DRI consumption in 1990 and 1991 was calculated by multiplying the total DRI consumption for all furnaces by the EAF share of total DRI consumption in 1992. Data for DRI consumed in BOFs were not available for the years 1990 through 1993. BOF DRI consumption in 1990 through 1993 was calculated by multiplying the total DRI consumption for all furnaces (excluding EAFs and cupola) by the BOF share of total DRI consumption (excluding EAFs and cupola) in 1994.

The Tier 1 CO₂ emission factors for sinter production, direct reduced iron production and pellet production were obtained through the 2006 IPCC Guidelines (IPCC 2006). Time-series data for pig iron production, coke, natural gas, fuel oil, sinter, and pellets consumed in the blast furnace; pig iron production; and blast furnace gas produced at the iron and steel mill and used in the metallurgical coke ovens and other steel mill activities were obtained from AISI's Annual Statistical Report (AISI 2004 through 2021) and through personal communications with AISI (Steiner 2008) (see Table 4-82 and Table 4-83). Data including blast furnace gas, coke oven gas, natural gas, limestone, sinter, and natural ore consumption for blast furnaces, coke production, and steelmaking furnaces (EAFs and BOFs) from the AISI Annual Statistical Report were withheld for 2021 and 2020, so the 2019 values were used as estimated data for the missing 2021 and 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section. Similarly, the percent of total steel production for EAF and BOF steelmaking processes were withheld for 2021, so the 2020 values were used as estimated data for the missing 2021 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

Data for EAF steel production, carbon-containing flux, EAF charge carbon, and natural gas consumption were obtained from AISI's Annual Statistical Report (AISI 2004 through 2022) and through personal communications with AISI (AISI 2006 through 2016, Steiner 2008). The factor for the quantity of EAF anode consumed per ton of EAF steel produced was provided by AISI (Steiner 2008). Data for BOF steel production, carbon-containing flux, natural gas, natural ore, pellet, sinter consumption as well as BOF steel production were obtained from AISI's Annual Statistical Report (AISI 2004 through 2022) and through personal communications with AISI (Steiner 2008). Data for EAF consumption of natural gas and BOF consumption of coke oven gas, limestone, and natural ore from the AISI Annual Statistical Report were not available for 2021, so 2020 values were used as estimated data for the

missing 2021 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section. Data for EAF and BOF scrap steel, pig iron, and DRI consumption were obtained from the USGS Minerals Yearbook - Iron and Steel Scrap (USGS 1991 through 2021) and personal communication with the USGS Iron and Steel Commodity Specialist (Tuck 2023). Data on coke oven gas and blast furnace gas consumed at the iron and steel mill (other than in the EAF, BOF, or blast furnace) were obtained from AISI's Annual Statistical Report (AISI 2004 through 2021) and through personal communications with AISI (Steiner 2008). These data were not available for 2021, so 2020 values were used as estimated data for the missing 2021 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section. Some data from the AISI Annual Statistical Report on natural gas consumption were withheld for 2020, so the 2019 values were used as estimated data for the missing 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

Data on blast furnace gas and coke oven gas sold for use as synthetic natural gas were obtained from EIA's Natural Gas Annual (EIA 2020). Carbon contents for direct reduced iron, EAF carbon electrodes, EAF charge carbon, limestone, dolomite, pig iron, and steel were provided by the 2006 IPCC Guidelines. The carbon contents for natural gas, fuel oil, and direct injection coal were obtained from EIA (EIA 2017b) and EPA (EPA 2010). Heat contents for fuel oil and direct injection coal were obtained from EIA (EIA 1992, 2011); natural gas heat content was obtained from Table 37 of AISI's Annual Statistical Report (AISI 2004 through 2021). Heat contents for coke oven gas and blast furnace gas were provided in Table 37 of AISI's Annual Statistical Report (AISI 2004 through 2021) and confirmed by AISI staff (Carroll 2016).

Table 4-82: Production and Consumption Data for the Calculation of CO₂ and CH₄ Emissions from Iron and Steel Production (Thousand Metric Tons)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	12,239	8,315	4,347	4,687	4,378	3,747	4,182
Direct Reduced Iron Production	517	1,303	С	С	С	С	С
Pellet Production	60,563	50,096	28,916	30,793	29,262	25,044	27,949
Pig Iron Production							
Coke Consumption	24,946	13,832	7,101	7,618	7,291	6,240	6,964
Pig Iron Production	49,669	37,222	22,395	24,058	22,302	18,320	22,246
Direct Injection Coal							
Consumption	1,485	2,573	2,125	2,569	2,465	2,110	2,354
EAF Steel Production							
EAF Anode and Charge Carbon							
Consumption	67	1,127	1,127	1,133	1,137	1,118	1,130
Scrap Steel Consumption	42,691	46,600	С	С	С	С	С
Flux Consumption	319	695	998	998	998	998	998
EAF Steel Production	33,511	52,194	55,825	58,904	61,172	51,349	57,307
BOF Steel Production							
Pig Iron Consumption	47,307	34,400	С	С	С	С	С
Scrap Steel Consumption	14,713	11,400	С	С	С	С	С
Flux Consumption	576	582	408	408	363	311	347
BOF Steel Production	43,973	42,705	25,788	27,704	26,591	21,384	23,865

C (Confidential)

Table 4-83: Production and Consumption Data for the Calculation of CO₂ Emissions from Iron and Steel Production (Million ft³ unless otherwise specified)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Pig Iron Production							
Natural Gas Consumption Fuel Oil Consumption	56,273	59,844	38,142	40,204	37,934	32,465	36,232
(thousand gallons)	163,397	16,170	4,352	3,365	2,321	1,986	2,217

Coke Oven Gas							
Consumption	22,033	16,557	12,459	13,337	12,926	11,063	12,346
Blast Furnace Gas							
Production	1,439,380	1,299,980	808,499	871,860	836,033	715,509	798,522
EAF Steel Production							
Natural Gas Consumption	15,905	19,985	8,105	8,556	9,115	7,801	8,706
BOF Steel Production							
Coke Oven Gas							
Consumption	3,851	524	374	405	389	333	372
Other Activities							
Coke Oven Gas							
Consumption	224,883	97,132	62,164	67,008	64,377	55,096	61,489
Blast Furnace Gas							
Consumption	1,414,778	1,295,520	804,816	867,838	832,119	712,159	794,783

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The estimates of CO₂ emissions from metallurgical coke production are based on assessing uncertainties in material production and consumption data and average carbon contents. Uncertainty is associated with the total U.S. coking coal consumption, total U.S. coke production, and materials consumed during this process. Data for coking coal consumption and metallurgical coke production are from different data sources (EIA) than data for other carbonaceous materials consumed at coke plants (AISI), which does not include data for merchant coke plants. There is uncertainty associated with the fact that coal tar and coke breeze production were estimated based on coke production because coal tar and coke breeze production data were not available. Since merchant coke plant data is not included in the estimate of other carbonaceous materials consumed at coke plants, the mass balance equation for CO₂ from metallurgical coke production cannot be reasonably completed; therefore, for the purpose of this analysis, uncertainty parameters are applied to primary data inputs to the calculation (i.e., coking coal consumption and metallurgical coke production) only.

The estimates of CO₂ emissions from iron and steel production are based on material production and consumption data and average carbon contents. There is uncertainty associated with the assumption that pellet production, direct reduced iron and sinter consumption are equal to production. There is uncertainty with the representativeness of the associated IPCC default emission factors. There is uncertainty associated with the assumption that all coal used for purposes other than coking coal is for direct injection coal. There is also uncertainty associated with the carbon contents for pellets, sinter, and natural ore, which are assumed to equal the carbon contents of direct reduced iron, when consumed in the blast furnace. There is uncertainty associated with the consumption of natural ore under current industry practices. For EAF steel production, there is uncertainty associated with the amount of EAF anode and charge carbon consumed due to inconsistent data throughout the time series. Also for EAF steel production, there is uncertainty associated with the assumption that 100 percent of the natural gas attributed to "steelmaking furnaces" by AISI is process-related and nothing is combusted for energy purposes. Uncertainty is also associated with the use of process gases such as blast furnace gas and coke oven gas. Data are not available to differentiate between the use of these gases for processes at the steel mill versus for energy generation (i.e., electricity and steam generation); therefore, all consumption is attributed to iron and steel production. These data and carbon contents produce a relatively accurate estimate of CO₂ emissions; however, there are uncertainties associated with each.

For calculating the emissions estimates from iron and steel and metallurgical coke production, EPA utilizes a number of data points taken from the AISI Annual Statistical Report (ASR). This report serves as a benchmark for information on steel companies in United States, regardless if they are a member of AISI, which represents

integrated producers (i.e., blast furnace and EAF). During the compilation of the 1990 through 2016 Inventory report EPA initiated conversation with AISI to better understand and update the qualitative and quantitative uncertainty metrics associated with AISI data elements. AISI estimates their data collection response rate to range from 75 to 90 percent, with certain sectors of the iron and steel industry not being covered by the ASR; therefore, there is some inherent uncertainty in the values provided in the AISI ASR, including material production and consumption data. There is also some uncertainty to which materials produced are exported to Canada. As indicated in the introduction to this section, the trend for integrated facilities has moved to more use of EAFs and fewer BOFs. This trend may not be completely captured in the current data which also increases uncertainty. EPA assigned an uncertainty range of ±10 percent for the primary data inputs (e.g., consumption and production values for each production process, heat and carbon content values) to calculate overall uncertainty from iron and steel production, and using this suggested uncertainty provided in Table 4.4 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). During EPA's discussion with AISI, AISI noted that an uncertainty range of ±5 percent would be a more appropriate approximation to reflect their coverage of integrated steel producers in the United States. EPA will continue to assess the best range of uncertainty for these values. EPA assigned an uncertainty range of ±25 percent for the Tier 1 CO₂ emission factors for the sinter, direct reduced iron, and pellet production processes, and using this suggested uncertainty provided in Table 4.4 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-84 for metallurgical coke production and iron and steel production. Total CO₂ emissions from metallurgical coke production and iron and steel production for 2021 were estimated to be between 33.8 and 49.6 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 19 percent below and 19 percent above the emission estimate of 41.7 MMT CO₂ Eq. Total CH₄ emissions from metallurgical coke production and iron and steel production for 2021 were estimated to be between 0.007 and 0.010 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 20 percent below and 21 percent above the emission estimate of 0.008 MMT CO₂ Eq.

Table 4-84: Approach 2 Quantitative Uncertainty Estimates for CO₂ and CH₄ Emissions from Iron and Steel Production and Metallurgical Coke Production (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate						
		(MMT CO₂ Eq.)	(MMT	CO ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Metallurgical Coke & Iron	60	41.7	22.0	40.6	100/	.100/			
and Steel Production	CO ₂	41.7	33.8	49.6	-19%	+19%			
Metallurgical Coke & Iron	CII				-20%	+21%			
and Steel Production	CH₄	+	+	+	-20%	+21%			

⁺ Does not exceed 0.05 MMT CO₂ Eq.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Recalculations Discussion

Recalculations were performed for the year 2020 with updated values for DRI, pig iron, and scrap steel consumption for both BOF and EAF steel production. Compared to the previous Inventory, CO₂ emissions from steel production increased by less than 1 percent (7 kt CO₂).

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

In addition, for the current Inventory, CO₂-equivalent estimates of CH₄ emissions from sinter production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CO₂-equivalent CH₄ increased from 25 to 28 between the AR4 and AR5 reports, leading to an overall increase in calculated CO₂-equivalent CH₄ emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual CH4 emissions from sinter production increased by 12 percent each year, ranging from 0.78 kt CO₂ Eq. in 2009 to 2.6 kt CO₂ Eq. in 1993. The net impact on the entire category from these updates was an annual 0.002 percent increase in emissions for each year of the time series, reflecting the relative low contribution of CH₄ emissions to the overall category. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Significant activity data for 2021 and 2020 were not available for this report and were estimated using 2019 values and adjusted using GHGRP emissions data. EPA will continue to explore sources of 2021 and 2020 data and other estimation approaches. EPA will evaluate and analyze data reported under EPA's GHGRP to improve the emission estimates for Iron and Steel Production process categories. Particular attention will be made to ensure time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.⁵⁸ This is a near to medium-term improvement, and per preliminary work, EPA estimates that the earliest this improvement could be incorporated is the 2024 Inventory submission.

Additional improvements include accounting for emission estimates for the production of metallurgical coke in the Energy chapter as well as identifying the amount of carbonaceous materials, other than coking coal, consumed at merchant coke plants. Other potential improvements include identifying the amount of coal used for direct injection and the amount of coke breeze, coal tar, and light oil produced during coke production. Efforts will also be made to identify information to better characterize emissions from the use of process gases and fuels within the Energy and IPPU chapters. Additional efforts will be made to improve the reporting between the IPPU and Energy chapters, particularly the inclusion of a quantitative summary of the carbon balance in the United States. This planned improvement is a long-term improvement and is still in development. It is not included in this current Inventory report. EPA estimates that the earliest this improvement could be incorporated is the 2024 Inventory submission.

Ferroalloy Production (CRF Source Category 2C2)

Carbon dioxide (CO₂) and methane (CH₄) are emitted from the production of several ferroalloys. Ferroalloys are composites of iron (Fe) and other elements such as silicon (Si), manganese (Mn), and chromium (Cr). Emissions from fuels consumed for energy purposes during the production of ferroalloys are accounted for in the Energy

⁵⁸ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

chapter. Emissions from the production of two types of ferrosilicon (25 to 55 percent and 56 to 95 percent silicon), silicon metal (96 to 99 percent silicon), and miscellaneous alloys (32 to 65 percent silicon) have been calculated.

Emissions from the production of ferrochromium and ferromanganese are not included because of the small number of manufacturers of these materials in the United States. Government information disclosure rules prevent the publication of production data for these production facilities. Additionally, production of ferrochromium in the United States ceased in 2009 (USGS 2013a).

Similar to emissions from the production of iron and steel, CO2 is emitted when metallurgical coke is oxidized during a high-temperature reaction with iron and the selected alloying element. Due to the strong reducing environment, CO is initially produced and eventually oxidized to CO2. A representative reaction equation for the production of 50 percent ferrosilicon (FeSi) is given below:

$$Fe_2O_3 + 2SiO_2 + 7C \rightarrow 2FeSi + 7CO$$

While most of the carbon contained in the process materials is released to the atmosphere as CO2, a percentage is also released as CH₄ and other volatiles. The amount of CH₄ that is released is dependent on furnace efficiency, operation technique, and control technology.

Ferroalloys are used to alter the material properties of the steel. Ferroalloys are produced in conjunction with the iron and steel industry, often at co-located facilities, and production trends closely follow that of the iron and steel industry. As of 2018, 11 facilities in the United States produce ferroalloys (USGS 2022b).

Emissions of CO₂ from ferroalloy production in 2021 were 1.6 MMT CO₂ Eq. (1,567 kt CO₂) (see Table 4-85 and Table 4-86), which is a 14 percent increase since 2020 and a 27 percent reduction since 1990. Emissions of CH₄ from ferroalloy production in 2021 were 0.01 MMT CO₂ Eq. (0.4 kt CH₄), which is a 14 percent increase since 2020 and a 35 percent decrease since 1990. The decrease in emissions since 1990 can largely be attributed to the closure of two facilities in 2018. The increase in emissions from 2020 can be attributed to one facility reopening its ferrosilicon production facility after shutting down in 2020 due to decreased demand during the COVID-19 pandemic (USGS 2022a).

Table 4-85: CO₂ and CH₄ Emissions from Ferroalloy Production (MMT CO₂ Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	2.2	1.4	2.0	2.1	1.6	1.4	1.6
CH_4	+	+	+	+	+	+	+
Total	2.2	1.4	2.0	2.1	1.6	1.4	1.6

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Table 4-86: CO₂ and CH₄ Emissions from Ferroalloy Production (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	2,152	1,392	1,975	2,063	1,598	1,377	1,567
CH ₄	1	+	1	1	+	+	+

⁺ Does not exceed 0.5 kt

Methodology and Time-Series Consistency

Emissions of CO₂ and CH₄ from ferroalloy production were calculated ⁵⁹ using a Tier 1 method from the 2006 IPCC

⁵⁹ EPA has not integrated aggregated facility-level GHGRP information to inform these estimates. The aggregated information (e.g., activity data and emissions) associated with production of ferroalloys did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

Guidelines by multiplying annual ferroalloy production by material-specific default emission factors provided by IPCC (IPCC 2006). The Tier 1 equations for CO₂ and CH₄ emissions are as follows:

Equation 4-12: 2006 IPCC Guidelines Tier 1: CO₂ Emissions for Ferroalloy Production (Equation 4.15)

$$E_{CO_2} = \sum_{i} (MP_i \times EF_i)$$

where,

 E_{CO2} = CO_2 emissions, metric tons

MP_i = Production of ferroalloy type *i*, metric tons

EF_i = Generic emission factor for ferroalloy type *i*, metric tons CO₂/metric ton specific

ferroalloy product

Equation 4-13: 2006 IPCC Guidelines Tier 1: CH₄ Emissions for Ferroalloy Production (Equation 4.18)

$$E_{CH_4} = \sum_{i} (MP_i \times EF_i)$$

where,

E_{CH4} = CH₄ emissions, kg

MP_i = Production of ferroalloy type *i*, metric tons

EF_i = Generic emission factor for ferroalloy type i, kg CH₄/metric ton specific ferroalloy product

Default emission factors were used because country-specific emission factors are not currently available. The following emission factors were used to develop annual CO₂ and CH₄ estimates:

- Ferrosilicon, 25 to 55 percent Si and Miscellaneous Alloys, 32 to 65 percent Si: 2.5 metric tons CO₂/metric ton of alloy produced, 1.0 kg CH₄/metric ton of alloy produced.
- Ferrosilicon, 56 to 95 percent Si: 4.0 metric tons CO₂/metric ton alloy produced, 1.0 kg CH₄/metric ton of alloy produced.
- Silicon Metal: 5.0 metric tons CO₂/metric ton metal produced, 1.2 kg CH₄/metric ton metal produced.

It was assumed that 100 percent of the ferroalloy production was produced using petroleum coke in an electric arc furnace process (IPCC 2006), although some ferroalloys may have been produced with coking coal, wood, other biomass, or graphite carbon inputs. The amount of petroleum coke consumed in ferroalloy production was calculated assuming that the petroleum coke used is 90 percent carbon (C) and 10 percent inert material (Onder and Bagdoyan 1993).

The use of petroleum coke for ferroalloy production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO₂ from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion [CRF Source Category 1A]) and Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

Ferroalloy production data for 1990 through 2021 (see Table 4-87) were obtained from the U.S. Geological Survey (USGS) through the *Minerals Yearbook: Silicon* (USGS 1996 through 2022). The following data were available from the USGS publications for the time series:

- Ferrosilicon, 25 to 55 percent Si: Annual production data were available from 1990 through 2010.
- Ferrosilicon, 56 to 95 percent Si: Annual production data were available from 1990 through 2010.

- Silicon Metal: Annual production data were available from 1990 through 2005. Production data for 2005 were used as estimates for 2006 through 2010 because data for these years were not available due to government information disclosure rules.
- Miscellaneous Alloys, 32 to 65 percent Si: Annual production data were available from 1990 through 1998. Starting 1999, USGS reported miscellaneous alloys and ferrosilicon containing 25 to 55 percent silicon as a single category.

Starting with the 2011 publication, USGS ceased publication of production quantity by ferroalloy product and began reporting all the ferroalloy production data as a single category (i.e., Total Silicon Materials Production). This is due to the small number of ferroalloy manufacturers in the United States and government information disclosure rules. Ferroalloy product shares developed from the 2010 production data (i.e., ferroalloy product production divided by total ferroalloy production) were used with the total silicon materials production quantity to estimate the production quantity by ferroalloy product type for 2011 through 2021 (USGS 2017 through 2022).

Table 4-87: Production of Ferroalloys (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Ferrosilicon 25%-55%	321,385	123,000	181,775	189,846	147,034	126,681	144,227
Ferrosilicon 56%-95%	109,566	86,100	160,390	167,511	129,736	111,778	127,259
Silicon Metal	145,744	148,000	175,835	183,642	142,229	122,541	139,514
Misc. Alloys 32-65%	72,442	NA	NA	NA	NA	NA	NA

NA (Not Available) for product type, aggregated with ferrosilicon (25-55% Si)

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Annual ferroalloy production was reported by the USGS in three broad categories until the 2010 publication: ferroalloys containing 25 to 55 percent silicon (including miscellaneous alloys), ferroalloys containing 56 to 95 percent silicon, and silicon metal (through 2005 only, 2005 value used as an estimate for 2006 through 2010). Starting with the 2011 Minerals Yearbook: Silicon, USGS started reporting all the ferroalloy production under a single category: total silicon materials production. The total silicon materials quantity was allocated across the three categories, based on the 2010 production shares for the three categories. Refer to the Methodology section for further details. Additionally, production data for silvery pig iron (alloys containing less than 25 percent silicon) are not reported by the USGS to avoid disclosing proprietary company data. Emissions from this production category, therefore, were not estimated.

Some ferroalloys may be produced using wood or other biomass as a primary or secondary carbon source (carbonaceous reductants); however, information and data regarding these practices were not available. Emissions from ferroalloys produced with wood or other biomass would not be counted under this source because woodbased carbon is of biogenic origin. ⁶⁰ Even though emissions from ferroalloys produced with coking coal or graphite inputs would be counted in national trends, they may be generated with varying amounts of CO2 per unit of ferroalloy produced. The most accurate method for these estimates would be to base calculations on the amount of reducing agent used in the process, rather than the amount of ferroalloys produced. These data, however, were not available, and are also often considered confidential business information.

Emissions of CH₄ from ferroalloy production will vary depending on furnace specifics, such as type, operation technique, and control technology. Higher heating temperatures and techniques such as sprinkle charging would

⁶⁰ Emissions and sinks of biogenic carbon are accounted for in the Land Use, Land-Use Change, and Forestry chapter.

reduce CH₄ emissions; however, specific furnace information was not available or included in the CH₄ emission estimates.

EPA assigned a uncertainty range of ±25 percent for the primary emission factors (i.e., ferrosilicon 25-55% Si, ferrosilicon 56-95% Si, and silicon metal), and an uncertainty range of ±5 percent for the 2010 production values for ferrosilicon 25-55% Si, ferrosilicon 56-95% Si, and silicon metal production and the 2021 total silicon materials production value used to calculate emissions from overall ferroalloy production. Using these suggested uncertainties provided in in Table 4.9 of Section 4.3.3.2 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-88. Ferroalloy production CO₂ emissions from 2021 were estimated to be between 1.4 and 1.8 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 13 percent below and 13 percent above the emission estimate of 1.6 MMT CO₂ Eq. Ferroalloy production CH₄ emissions were estimated to be between a range of approximately 13 percent below and 13 percent above the emission estimate of 0.01 MMT CO2 Eq.

Table 4-88: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Ferroalloy Production (MMT CO₂ Eq. and Percent)

Source	Coo	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a						
	Gas	(MMT CO ₂ Eq.)	(MMT (CO ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Ferroalloy Production	CO ₂	1.6	1.4	1.8	-13%	+13%			
Ferroalloy Production	CH ₄	+	+	+	-13%	+13%			

⁺ Does not exceed 0.05 MMT CO₂ Eq.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter and Annex 8.

Recalculations Discussion

Recalculations were completed for 2014 based on revised total silicon materials production data from USGS. Compared to the previous Inventory, estimates of CO₂ emissions from ferroalloy production in 2014 increased by 4.8 percent (92 kt CO₂), and estimates of CH₄ emissions increased by 4.9 percent (0.026 kt CH₄).

In addition, for the current Inventory, CO₂-equivalent estimates of total CH₄ emissions from ferroalloy production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH4 increased from 25 to 28 between the AR4 and AR5 reports, leading to an overall increase in CO₂-equivalent estimates for CH₄ emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual CH4 emissions increased by 12 percent each year, ranging from 1.1 kt CO₂ Eq. in 2003 to 2.0 kt CO₂ Eq. in 1990. The net impact on the entire category from these updates was an average annual 0.09 percent increase in emissions for each year of the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Planned Improvements

Pending available resources and prioritization of improvements for more significant sources, EPA will continue to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates and category-specific QC procedures for the Ferroalloy Production source category. Given the small number of facilities and reporting thresholds, particular attention will be made to ensure completeness and time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon. 61 This is a long-term planned improvement, and EPA is still assessing the possibility of incorporating this improvement into the Inventory. This improvement has not been included in the current Inventory report.

Aluminum Production (CRF Source Category 2C3)

Aluminum is a lightweight, malleable, and corrosion-resistant metal that is used in many manufactured products, including aircraft, automobiles, bicycles, and kitchen utensils. As of recent reporting, the United States was the ninth 62 largest producer of primary aluminum, tied with Iceland with an aluminum production of 880 thousand metric tons, with approximately 1.3 percent of the world total production (USGS 2021). The United States was also a major importer of primary aluminum. The production of primary aluminum—in addition to consuming large quantities of electricity—results in process-related emissions of carbon dioxide (CO₂) and two perfluorocarbons (PFCs): perfluoromethane (CF_4) and perfluoroethane (C_2F_6).

Carbon dioxide is emitted during the aluminum smelting process when alumina (aluminum oxide, Al₂O₃) is reduced to aluminum using the Hall-Héroult reduction process. The reduction of the alumina occurs through electrolysis in a molten bath of natural or synthetic cryolite (Na₃AlF₆). The reduction cells contain a carbon (C) lining that serves as the cathode. Carbon is also contained in the anode, which can be a C mass of paste, coke briquettes, or prebaked C blocks from petroleum coke. During reduction, most of this C is oxidized and released to the atmosphere as CO₂.

Process emissions of CO₂ from aluminum production were estimated to be 1.5 MMT CO₂ Eq. (1,541 kt) in 2021 (see Table 4-89). The C anodes consumed during aluminum production consist of petroleum coke and, to a minor extent, coal tar pitch. The petroleum coke portion of the total CO₂ process emissions from aluminum production is considered to be a non-energy use of petroleum coke and is accounted for here and not under the CO₂ from Fossil Fuel Combustion source category of the Energy sector. Similarly, the coal tar pitch portion of these CO₂ process emissions is accounted for here.

Table 4-89: CO₂ Emissions from Aluminum Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5

⁶¹ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

⁶² Based on the U.S. USGS (2021) Aluminum factsheet, assuming all countries grouped under the "other countries" categories all have lower production than the U.S. Available at: https://pubs.usgs.gov/periodicals/mcs2022/mcs2022-aluminum.pdf

Table 4-90: CO₂ Emissions from Aluminum Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Aluminum Production	6,831	4,142	1,205	1,455	1,880	1,748	1,541

In addition to CO₂ emissions, the aluminum production industry is also a source of PFC emissions. During the smelting process, when the alumina ore content of the electrolytic bath falls below critical levels required for electrolysis, rapid voltage increases occur, which are termed High Voltage Anode Effects (HVAEs) HVAEs cause C from the anode and fluorine from the dissociated molten cryolite bath to combine, thereby producing fugitive emissions of CF₄ and C₂F₆. In general, the magnitude of emissions for a given smelter and level of production depends on the frequency and duration of these anode effects. As the frequency and duration of the anode effects increase, emissions increase. Another type of anode effect, Low Voltage Anode Effects (LVAEs), became a concern in the early 2010s as the aluminum industry increasingly began to use cell technologies with higher amperage and additional anodes (IPCC 2019). LVAEs emit CF4 and are included in PFC emission totals from 2006 forward.

Since 1990, emissions of CF₄ and C₂F₆ have both declined by 95 and 97 percent respectively, to 0.82 MMT CO₂ Eq. of CF₄ (0.1 kt) and 0.10 MMT CO₂ Eq. of C_2F_6 (0.01 kt) in 2021, respectively, as shown in Table 4-91 and Table 4-92. This decline is due both to reductions in domestic aluminum production and to actions taken by aluminum smelting companies to reduce the frequency and duration of anode effects. These actions include technology and operational changes such as employee training, use of computer monitoring, and changes in alumina feeding techniques. Since 1990, aluminum production has declined by 78 percent, while the combined CF4 and C2F6 emission rate (per metric ton of aluminum produced) has been reduced by 78 percent. PFC emissions decreased by approximately 36 percent between 2020 and 2021. Aluminum production also decreased in 2021, down 13 percent from 2020.

Table 4-91: PFC Emissions from Aluminum Production (MMT CO₂ Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CF ₄	16.1	2.6	0.7	1.0	1.1	1.2	0.8
C_2F_6	3.2	0.5	0.3	0.4	0.3	0.2	0.1
Total	19.3	3.1	1.0	1.4	1.4	1.4	0.9

Note: Totals may not sum due to independent rounding.

Table 4-92: PFC Emissions from Aluminum Production (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CF ₄	2.4	0.4	0.1	0.2	0.2	0.2	0.1
C ₂ F ₆	0.3	+	+	+	+	+	+

In 2021, U.S. primary aluminum production totaled approximately 0.88 million metric tons, a 13 percent decrease from 2020 production levels (USGS 2022). In 2021, three companies managed production at six operational primary aluminum smelters in five states. Two smelters operated at full capacity during 2021, while four smelters operated at reduced capacity (USGS 2022). Domestic smelters were operating at about 55 percent of capacity of 1.64 million tons per year at year end 2021 (USGS 2022).

Methodology and Time-Series Consistency

Process CO₂ and PFC (i.e., CF₄ and C₂F₆) emission estimates from primary aluminum production for 2010 through 2021 are available from EPA's GHGRP Subpart F (Aluminum Production) (EPA 2022). Under EPA's GHGRP, facilities began reporting primary aluminum production process emissions (for 2010) in 2011; as a result, GHGRP data (for

2010 through 2021) are available to be incorporated into the Inventory. EPA's GHGRP mandates that all facilities that contain an aluminum production process must report: CF_4 and C_2F_6 emissions from anode effects in all prebake and Søderberg electrolysis cells, CO_2 emissions from anode consumption during electrolysis in all prebake and Søderberg cells, and all CO_2 emissions from onsite anode baking. To estimate the process emissions, EPA's GHGRP uses the process-specific equations detailed in Subpart F (aluminum production). ⁶³ These equations are based on the Tier 2/Tier 3 IPCC (2006) methods for primary aluminum production, and Tier 1 methods when estimating missing data elements. It should be noted that the same methods (i.e., 2006 IPCC Guidelines) were used for estimating the emissions prior to the availability of the reported GHGRP data in the Inventory. Prior to 2010, aluminum production data were provided through EPA's Voluntary Aluminum Industrial Partnership (VAIP).

As previously noted, the use of petroleum coke for aluminum production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO₂ from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion [CRF Source Category 1A]) and Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

Process CO₂ Emissions from Anode Consumption and Anode Baking

Carbon dioxide emission estimates for the years prior to the introduction of EPA's GHGRP in 2010 were estimated using 2006 IPCC Guidelines methods, but individual facility reported data were combined with process-specific emissions modeling. These estimates were based on information previously gathered from EPA's Voluntary Aluminum Industrial Partnership (VAIP) program, U.S. Geological Survey (USGS) Mineral Commodity reviews, and The Aluminum Association (USAA) statistics, among other sources. Since pre- and post-GHGRP estimates use the same methodology, emission estimates are comparable across the time series.

Most of the CO_2 emissions released during aluminum production occur during the electrolysis reaction of the C anode, as described by the following reaction:

$$2Al_2O_3 + 3C \rightarrow 4Al + 3CO_2$$

For prebake smelter technologies, CO_2 is also emitted during the anode baking process. These emissions can account for approximately 10 percent of total process CO_2 emissions from prebake smelters.

Depending on the availability of smelter-specific data, the CO₂ emitted from electrolysis at each smelter was estimated from: (1) the smelter's annual anode consumption, (2) the smelter's annual aluminum production and rate of anode consumption (per ton of aluminum produced) for previous and/or following years, or (3) the smelter's annual aluminum production and IPCC default CO₂ emission factors. The first approach tracks the consumption and carbon content of the anode, assuming that all C in the anode is converted to CO₂. Sulfur, ash, and other impurities in the anode are subtracted from the anode consumption to arrive at a C consumption figure. This approach corresponds to either the IPCC Tier 2 or Tier 3 method, depending on whether smelter-specific data on anode impurities are used. The second approach interpolates smelter-specific anode consumption rates to estimate emissions during years for which anode consumption data are not available. This approach avoids substantial errors and discontinuities that could be introduced by reverting to Tier 1 methods for those years. The last approach corresponds to the IPCC Tier 1 method (IPCC 2006) and is used in the absence of present or historic anode consumption data.

The equations used to estimate CO₂ emissions in the Tier 2 and 3 methods vary depending on smelter type (IPCC 2006). For Prebake cells, the process formula accounts for various parameters, including net anode consumption, and the sulfur, ash, and impurity content of the baked anode. For anode baking emissions, the formula accounts

⁶³ Code of Federal Regulations, Title 40: Protection of Environment, Part 98: Mandatory Greenhouse Gas Reporting, Subpart F—Aluminum Production. See https://www.ecfr.gov/cgi-bin/text-idx?SID=24a41781dfe4218b339e914de03e8727&mc=true&node=pt40.23.98&rgn=div5#sp40.23.98.f.

for packing coke consumption, the sulfur and ash content of the packing coke, as well as the pitch content and weight of baked anodes produced. For Søderberg cells, the process formula accounts for the weight of paste consumed per metric ton of aluminum produced, and pitch properties, including sulfur, hydrogen, and ash content.

Through the VAIP, anode consumption (and some anode impurity) data have been reported for 1990, 2000, 2003, 2004, 2005, 2006, 2007, 2008, and 2009. Where available, smelter-specific process data reported under the VAIP were used; however, if the data were incomplete or unavailable, information was supplemented using industry average values recommended by IPCC (2006). Smelter-specific CO2 process data were provided by 18 of the 23 operating smelters in 1990 and 2000, by 14 out of 16 operating smelters in 2003 and 2004, 14 out of 15 operating smelters in 2005, 13 out of 14 operating smelters in 2006, 5 out of 14 operating smelters in 2007 and 2008, and 3 out of 13 operating smelters in 2009. For years where CO₂ emissions data or CO₂ process data were not reported by these companies, estimates were developed through linear interpolation, and/or assuming representative (e.g., previously reported or industry default) values.

In the absence of any previous historical smelter-specific process data (i.e., 1 out of 13 smelters in 2009; 1 out of 14 smelters in 2006, 2007, and 2008; 1 out of 15 smelters in 2005; and 5 out of 23 smelters between 1990 and 2003), CO₂ emission estimates were estimated using Tier 1 Søderberg and/or Prebake emission factors (metric ton of CO₂ per metric ton of aluminum produced) from IPCC (2006).

Process PFC Emissions from Anode Effects

High Voltage Anode Effects

Smelter-specific PFC emissions from aluminum production for 2010 through 2021 were reported to EPA under its GHGRP. To estimate their PFC emissions from HVAEs and report them under EPA's GHGRP, smelters use an approach identical to the Tier 3 approach in the 2006 IPCC Guidelines (IPCC 2006). Specifically, they use a smelterspecific slope coefficient as well as smelter-specific operating data to estimate an emission factor using the following equation:

$$PFC = S \times AE$$

 $AE = F \times D$

where,

PFC CF₄ or C₂F₆, kg/MT aluminum

S Slope coefficient, PFC/AE

ΑE Anode effect, minutes/cell-day

F Anode effect frequency per cell-day

D Anode effect duration, minutes

They then multiply this emission factor by aluminum production to estimate PFC emissions from HVAEs. All U.S. aluminum smelters are required to report their emissions under EPA's GHGRP.

Perfluorocarbon emissions for the years prior to 2010 were estimated using the same equation, but the slopefactor used for some smelters was technology-specific rather than smelter-specific, making the method a Tier 2 rather than a Tier 3 approach for those smelters. Emissions and background data were reported to EPA under the VAIP. For 1990 through 2009, smelter-specific slope coefficients were available and were used for smelters representing between 30 and 94 percent of U.S. primary aluminum production. The percentage changed from year to year as some smelters closed or changed hands and as the production at remaining smelters fluctuated. For

smelters that did not report smelter-specific slope coefficients, IPCC technology-specific slope coefficients were applied (IPCC 2006). The slope coefficients were combined with smelter-specific anode effect data collected by aluminum companies and reported under the VAIP to estimate emission factors over time. For 1990 through 2009, smelter-specific anode effect data were available for smelters representing between 80 and 100 percent of U.S. primary aluminum production. Where smelter-specific anode effect data were not available, representative values (e.g., previously reported or industry averages) were used.

For all smelters, emission factors were multiplied by annual production to estimate annual emissions at the smelter level. For 1990 through 2009, smelter-specific production data were available for smelters representing between 30 and 100 percent of U.S. primary aluminum production. (For the years after 2000, this percentage was near the high end of the range.) Production at non-reporting smelters was estimated by calculating the difference between the production reported under VAIP and the total U.S. production supplied by USGS, and then allocating this difference to non-reporting smelters in proportion to their production capacity. Emissions were then aggregated across smelters to estimate national emissions.

Table 4-93: Summary of HVAE Emissions

Year	1990	2005	2017	2018	2019	2020	2021
MMT CO ₂ Eq.	19.3	3.1	0.9	1.4	1.4	1.4	0.9

Low Voltage Anode Effects

LVAE emissions of CF₄ were estimated for 2006 through 2021 based on the Tier 1 (technology-specific, productionbased) method in the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2019). Prior to 2006, LVAE emissions are believed to have been negligible. ⁶⁴ The Tier 1 method is used in the LVAE emissions calculations from aluminum production in the absence of smelter-specific data available to quantify the LVAE-specific process emissions. National aluminum production estimates (allocated to smelters as described below) and the technology used in individual smelters were the best available data to perform the emissions calculations, as smelter-specific production data is not publicly available.

The following equation was used to estimate LVAE PFC emissions:

Equation 4-14: CF₄ Emissions Resulting from Low Voltage Anode Effects

$$LVAE E_{CF4} = LVAE EF_{CF4} \times MP$$

where,

LVAE E_{CF4} = LVAE emissions of CF₄ from aluminum production, kg CF₄

LVAE EF_{CF4} = LVAE emission factor for CF_4 (default by cell technology type)

metal production by cell technology type, tons Al.

In the LVAE emissions calculations, the Metal Production (MP) factor is calculated differently for the years 2006 through 2009 than for 2010 and beyond. For years prior to GHGRP reporting (2006 through 2009), the MP factor is calculated by dividing the annual production reported by USGS with the total U.S. capacity reported for this specific year, based on the USGS yearbook and applying this national utilization factor to each facility's production

⁶⁴ The 2019 Refinement states, "Since 2006, the global aluminum industry has undergone changes in technology and operating conditions that make LVAE emissions much more prevalent 12; these changes have occurred not only through uptake of newer technologies (e.g., PFPBL to PFPBM) but also during upgrades within the same technology in order to maximize productivity and reduce energy use" (IPCC 2019). Footnote #12 uses the example of PFPBL, which is prevalent in the United States, as an older technology that has been upgraded.

capacity to obtain an estimated facility production value. For GHGRP reporting years (2010+), the methodology to calculate the MP value was changed to allocate the total annual production reported by USAA, based on the distribution of CO₂ emissions amongst the operating smelters in a specific year. The latter improves the accuracy of the LVAE emissions estimates over assuming capacity utilization is the same at all smelters. The main drawback of using this methodology to calculate the MP factor is that, in some instances, it led to production estimates that are slightly larger (less than six percent) than the production capacity reported that year. In practice, this is most likely explained by the differences in process efficiencies at each facility and to a lesser extent, differences in measurements and methods used by each facility to obtain their CO₂ estimates and the degree of uncertainty in the USGS annual production reporting.

Once LVAE emissions were estimated, they were then combined with HVAE emissions estimates to calculate total PFC emissions from aluminum production.

Table 4-94: Summary of LVAE Emissions

Year	2006	2017	2018	2019	2020	2021
MMT CO ₂ Eq.	0.13	0.05	0.05	0.07	0.06	0.05

Production Data

Between 1990 and 2009, production data were provided under the VAIP by 21 of the 23 U.S. smelters that operated during at least part of that period. For the non-reporting smelters, production was estimated based on the difference between reporting smelters and national aluminum production levels as reported to USGS, with allocation to specific smelters based on reported production capacities (USGS 1990 through 2009).

National primary aluminum production data for 2010 through 2021 were compiled using USGS Mineral Industry Surveys, and the USGS Mineral Commodity Summaries.

Table 4-95: Production of Primary Aluminum (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	4,048	2,481	741	891	1,093	1,012	880

Methodological approaches were applied to the entire time-series to ensure time-series consistency from 1990 through 2020.

Uncertainty

Uncertainty was estimated for the CO₂, CF₄, and C₂F₆ emission values reported by each individual facility to EPA's GHGRP, taking into consideration the uncertainties associated with aluminum production, anode effect minutes, and slope factors. The uncertainty bounds used for these parameters were established based on information collected under the VAIP and held constant through 2021. Uncertainty surrounding the reported CO₂, CF₄, and C₂F₆ emission values were determined to have a normal distribution with uncertainty ranges of approximately 6 percent below to 6 percent above, 16 percent below to 16 percent above, and 20 percent below to 20 percent above their 2021 emission estimates, respectively.

For LVAE, since emission values were not reported through EPA's GHGRP but estimated instead through a Tier 1 methodology, the uncertainty analysis examined uncertainty associated with primary capacity data as well as technology-specific emission factors. Uncertainty for each facility's primary capacity, reported in the USGS Yearbook, was estimated to have a Pert Beta distribution with an uncertainty range of 7 percent below to 7 percent above the capacity estimates based on the uncertainty of reported capacity data, the number of years since the facility reported new capacity data, and uncertainty in capacity utilization. Uncertainty was applied to LVAE emission factors according to technology using the uncertainty ranges provided in the 2019 Refinement to

the 2006 IPCC Guidelines. An uncertainty range for Horizontal Stud Søderberg (HSS) technology was not provided in the 2019 Refinement to the 2006 IPCC Guidelines due to insufficient data, so a normal distribution and uncertainty range of ± 99 percent was applied for that technology based on expert judgment. A Monte Carlo analysis was applied to estimate the overall uncertainty of the CO₂, CF₄, and C₂F₆ emission estimates for the U.S. aluminum industry as a whole, and the results are provided below.

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-85. Aluminum production-related CO_2 emissions were estimated to be between 1.50 and 1.58 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 2 percent below to 3 percent above the emission estimate of 1.54 MMT CO_2 Eq. Also, production-related CF_4 emissions were estimated to be between 0.75 and 0.89 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 9 percent below to 9 percent above the emission estimate of 0.82 MMT CO_2 Eq. Aluminum production-related C_2F_6 emissions were estimated to be between 0.09 and 0.11 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 11 percent below to 11 percent above the emission estimate of 0.10 MMT CO_2 Eq. Finally, Aluminum production-related aggregated PFCs emissions were estimated to be between 0.85 and 0.99 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 8 percent below to 8 percent above the emission estimate of 0.922 MMT CO_2 Eq.

Table 4-96: Approach 2 Quantitative Uncertainty Estimates for CO₂ and PFC Emissions from Aluminum Production (MMT CO₂ Eq. and Percent)

Source	C	2021 Emission Estimate	Uncertainty Range Relative to Emission Estima							
Jource	Gas	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)					
			Lower	Upper	Lower	Upper				
			Bound	Bound	Bound	Bound				
Aluminum Production	CO ₂	1.54	1.50	1.58	-2%	3%				
Aluminum Production	CF ₄	0.82	0.75	0.89	-9%	9%				
Aluminum Production	C_2F_6	0.10	0.09	0.11	-11%	11%				
Aluminum Production	PFCs	0.92	0.85	0.99	-8%	8%				

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details). For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). ⁶⁵ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

The total primary aluminum production estimates were updated to reflect data reported to the USGS (as detailed in Production Data section above) for all years 1990 to 2021. Previously, production estimates from the U.S.

⁶⁵ GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Aluminum Association and other external resources were used for some years. The data from USGS are compiled from the U.S. Geological Survey monthly surveys sent to the primary aluminum smelters owned by the companies operating in the United States. In recent years, all companies who were sent the surveys responded, making USGS data the most accurate available. These data source modifications did lead to minor differences in the greenhouse gas emissions calculations for some years between 2000 and 2009. No historical or current production estimates publicly available were found to be broken down into smelter specific production estimates. In addition, for the current Inventory, CO₂-equivalent emissions totals of CF₄ and C₂F₆ from Aluminum production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWPs of CF₄ and C₂F₆ have decreased, leading to an overall decrease in calculated CO₂-equivalent emissions from Aluminum production. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CF₄ emissions was a 10 percent decrease and the average annual change in CO₂-equivalent C₂F₆ emissions was a 9 percent decrease for the time series. The net impact from these updates was an average annual 10 percent decrease in CO₂-equivalent total PFC emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Magnesium Production and Processing 4.20 (CRF Source Category 2C4)

The magnesium metal production and casting industry uses sulfur hexafluoride (SF₆) as a cover gas to prevent the rapid oxidation of molten magnesium in the presence of air. Sulfur hexafluoride has been used in this application around the world for more than thirty years. A dilute gaseous mixture of SF₆ with dry air and/or carbon dioxide (CO₂) is blown over molten magnesium metal to induce and stabilize the formation of a protective crust. A small portion of the SF₆ reacts with the magnesium to form a thin molecular film of mostly magnesium oxide and magnesium fluoride. The amount of SF₆ reacting in magnesium production and processing is considered to be negligible and thus all SF₆ used is assumed to be emitted into the atmosphere. Alternative cover gases, such as AM-cover™ (containing HFC-134a), Novec™ 612 (FK-5-1-12) and dilute sulfur dioxide (SO₂) systems can and are being used by some facilities in the United States. However, many facilities in the United States are still using traditional SF₆ cover gas systems. Carbon dioxide is also released during primary magnesium production if carbonate based raw materials, such as dolomite, are used. During the processing of these raw materials to produce magnesium, calcination occurs which results in a release of CO₂ emissions.

The magnesium industry emitted 1.1 MMT CO₂ Eq. (0.05 kt) of SF₆, 0.04 MMT CO₂ Eq. (0.03 kt) of HFC-134a, and 0.003 MMT CO₂ Eq. (2.9 kt) of CO₂ in 2021. This represents an increase of approximately 24 percent from total 2020 emissions (see Table 4-97 and Table 4-98) and an increase in SF₆ emissions by 26 percent. In 2021, total HFC-134a emissions decreased from 0.052 MMT CO₂ Eq. to 0.040 MMT CO₂ Eq., or a 24 percent decrease as compared to 2020 emissions. FK 5-1-12 emissions in 2021 were consistent with 2020. The emissions of the carrier gas, CO₂, decreased from 2.97 kt in 2020 to 2.92 kt in 2021, or 2 percent.

Table 4-97: SF₆, HFC-134a, FK 5-1-12 and CO₂ Emissions from Magnesium Production and Processing (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
SF ₆	5.4	2.9	1.0	1.1	0.9	0.9	1.1
HFC-134a	0.0	0.0	0.1	0.1	0.1	0.1	+
CO ₂	0.1	+	4	+	+	+	+
FK 5-1-12 ^a	0.0	0.0	4	+	+	+	+

1000.	Total 5.5	2.9	1.1	1.1	1.0	0.9	1.2
-------	-----------	-----	-----	-----	-----	-----	-----

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 4-98: SF₆, HFC-134a, FK 5-1-12 and CO₂ Emissions from Magnesium Production and Processing (kt)

Year	1990	2005	2017	2018	2019	2020	2021
SF ₆	+	+	+	+	+	+	+
HFC-134a	0.0	0.0	+	+	+	+	+
CO ₂	128.4	3.3	3.3	1.6	2.4	3.0	2.9
FK 5-1-12 ^a	0.0	0.0	+	+	+	+	+

⁺ Does not exceed 0.5 kt

Methodology and Time-Series Consistency

Emission estimates for the magnesium industry incorporate information provided by industry participants in EPA's SF₆ Emission Reduction Partnership for the Magnesium Industry as well as emissions data reported through Subpart T (Magnesium Production and Processing) of EPA's GHGRP. The Partnership started in 1999 and, in 2010, participating companies represented 100 percent of U.S. primary and secondary production and 16 percent of the casting sector production (i.e., die, sand, permanent mold, wrought, and anode casting). SF₆ emissions for 1999 through 2010 from primary production, secondary production (i.e., recycling), and die casting were generally reported by Partnership participants. Partners reported their SF₆ consumption, which is assumed to be equivalent to emissions. Along with SF₆, some Partners reported their HFC-134a and FK 5-1-12 consumed, which is also assumed to be equal to emissions. The last reporting year under the Partnership was 2010. Emissions data for 2011 through 2020 are obtained through EPA's GHGRP. Under the program, owners or operators of facilities that have a magnesium production or casting process must report emissions from use of cover or carrier gases, which include SF₆, HFC-134a, FK 5-1-12 and CO₂. Consequently, cover and carrier gas emissions from magnesium production and processing were estimated for three time periods, depending on the source of the emissions data: 1990 through 1998 (pre-EPA Partnership), 1999 through 2010 (EPA Partnership), and 2011 through 2021 (EPA GHGRP). The methodologies described below also make use of magnesium production data published by the U.S. Geological Survey (USGS) as available.

1990 through 1998

To estimate emissions for 1990 through 1998, industry SF_6 emission factors were multiplied by the corresponding metal production and consumption (casting) statistics from USGS. For this period, it was assumed that there was no use of HFC-134a or FK 5-1-12 cover gases, and hence emissions were not estimated for these alternatives.

Sulfur hexafluoride emission factors from 1990 through 1998 were based on a number of sources and assumptions. Emission factors for primary production were available from U.S. primary producers for 1994 and 1995. The primary production emission factors were 1.2 kg SF₆ per metric ton for 1990 through 1993, and 1.1 kg SF₆ per metric ton for 1994 through 1997. The emission factor for secondary production from 1990 through 1998 was assumed to be constant at the 1999 average Partner value. An emission factor for die casting of 4.1 kg SF₆ per metric ton, which was available for the mid-1990s from an international survey (Gjestland and Magers 1996), was used for years 1990 through 1996. For 1996 through 1998, the emission factor for die casting was assumed to decline linearly to the level estimated based on Partner reports in 1999. This assumption is consistent with the trend in SF₆ sales to the magnesium sector that was reported in the RAND survey of major SF₆ manufacturers, which showed a decline of 70 percent from 1996 to 1999 (RAND 2002). Sand casting emission factors for 1990 through 2001 were assumed to be the same as the 2002 emission factor. The emission factors for the other processes (i.e., permanent mold, wrought, and anode casting), about which less is known, were assumed to remain

^a Emissions of FK 5-1-12 are not included in totals.

^a Emissions of FK 5-1-12 are not included in totals.

constant at levels defined in Table 4-97. The emission factors for the other processes (i.e., permanent mold, wrought, and anode casting) were based on discussions with industry representatives.

The quantities of CO_2 carrier gas used for each production type have been estimated using the 1999 estimated CO_2 emissions data and the annual calculated rate of change of SF_6 use in the 1990 through 1999 time period. For each year and production type, the rate of change of SF_6 use between the current year and the subsequent year was first estimated. This rate of change was then applied to the CO_2 emissions of the subsequent year to determine the CO_2 emission of the current year.

Carbon dioxide emissions from the calcination of dolomite in the primary production of magnesium were calculated based on the 2006 IPCC Guidelines Tier 2 method by multiplying the estimated primary production of magnesium by an emissions factor of 3.62 kilogram of CO_2 per kilogram of magnesium produced. ⁶⁶ For 1990 through 1998, production was estimated to be equal to the production capacity of the facility.

1999 through 2010

The 1999 through 2010 emissions from primary and secondary production were based on information provided by EPA's industry Partners. In some instances, there were years of missing Partner data, including SF₆ consumption and metal processed. For these situations, emissions were estimated through interpolation where possible, or by holding company-reported emissions (as well as production) constant from the previous year. For alternative cover gases, including HFC-134a and FK 5-1-12, mainly reported data was relied upon. That is, unless a Partner reported using an alternative cover gas, it was not assumed it was used. Emissions of alternate gases were also estimated through linear interpolation where possible.

The die casting emission estimates for 1999 through 2010 were also based on information supplied by industry Partners. When a Partner was determined to be no longer in production, its metal production and usage rates were set to zero. Missing data on emissions or metal input was either interpolated or held constant at the last available reported value. In 1999 through 2010, Partners were assumed to account for all die casting tracked by USGS. For 1999, die casters who were not Partners were assumed to be similar to Partners who cast small parts. Due to process requirements, these casters consume larger quantities of SF_6 per metric ton of processed magnesium than casters that process large parts. Consequently, emission estimates from this group of die casters were developed using an average emission factor of 5.2 kg SF_6 per metric ton of magnesium. This emission factor was developed using magnesium production and SF_6 usage data for the year 1999. In 2008, the derived emission factor for die casting began to increase after many years of largely decreasing emission factors. As determined through an analysis of activity data reported from the USGS, this increase is due to a temporary decrease in production at many facilities between 2008 and 2010, which reflects the change in production that occurred during the recession.

The emissions from other casting operations were estimated by multiplying emission factors (kg SF_6 per metric ton of metal produced or processed) by the amount of metal produced or consumed from USGS, with the exception of some years for which Partner sand casting emissions data are available. The emission factors for sand casting activities were acquired through the data reported by the Partnership for 2002 to 2006. For 1999 through 2001, the sandcasting emission factor was held constant at the 2002 Partner-reported level. For 2007 through 2010, the sandcasting Partner did not report and the reported emission factor from 2005 was applied to the Partner and to all other sand casters. Activity data for 2005 was obtained from USGS (USGS 2005b).

The emission factors for primary production, secondary production and sand casting for the 1999 to 2010 are not published to protect company-specific production information. However, the emission factor for primary production has not risen above the average 1995 Partner value of 1.1 kg SF_6 per metric ton. The emission factors

66 See https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/3 Volume3/V3 4 Ch4 Metal Industry.pdf.

for the other industry sectors (i.e., permanent mold, wrought, and anode casting) were based on discussions with industry representatives. The emission factors for casting activities are provided below in Table 4-99.

The emissions of HFC-134a and FK-5-1-12 were included in the estimates for only instances where Partners reported that information to the Partnership. Emissions of these alternative cover gases were not estimated for instances where emissions were not reported.

Carbon dioxide carrier gas emissions were estimated using the emission factors developed based on GHGRPreported carrier gas and cover gas data, by production type. It was assumed that the use of carrier gas, by production type, is proportional to the use of cover gases. Therefore, an emission factor, in kg CO2 per kg cover gas and weighted by the cover gases used, was developed for each of the production types. GHGRP data, on which these emissions factors are based, was available for primary, secondary, die casting and sand casting. The emission factors were applied to the quantity of all cover gases used (SF₆, HFC-134a, and FK-5-1-12) by production type in this time period for producers that reported CO₂ emissions from 2011-2020 through the GHGP. Carrier gas emissions for the 1999 through 2010 time period were only estimated for those Partner companies that reported using CO₂ as a carrier gas through the GHGRP. Using this approach helped ensure time-series consistency. Emissions of carrier gases for permanent mold, wrought, and anode processes were estimated using the ratio of total CO₂ emissions to total cover gas emissions for primary, secondary, die and sand in a given year and the total SF₆ emissions from each permanent mold, wrought, and anodes processes respectively in that same year. CO₂ emissions from the calcination of dolomite were estimated using the same approach as described above. At the end of 2001, the sole magnesium production plant operating in the United States that produced magnesium metal using a dolomitic process that resulted in the release of CO₂ emissions ceased its operations (USGS 1995b through 2020).

Table 4-99: SF₆ Emission Factors (kg SF₆ per metric ton of magnesium)

Year	Die Casting ^a	Permanent Mold	Wrought	Anodes
1999	1.75 ^b	2	1	1
2000	0.72	2	1	1
2001	0.72	2	1	1
2002	0.71	2	1	1
2003	0.81	2	1	1
2004	0.79	2	1	1
2005	0.77	2	1	1
2006	0.88	2	1	1
2007	0.64	2	1	1
2008	0.97	2	1	1
2009	1.41	2	1	1
2010	1.43	2	1	1

^a Weighted average includes all die casters, Partners and non-Partners. For the majority of the time series (2000 through 2010), Partners made up 100 percent of die casters in the United States.

2011 through 2021

For 2011 through 2021, for the primary and secondary producers, GHGRP-reported cover and carrier gases emissions data were used. For sand and die casting, some emissions data was obtained through EPA's GHGRP. Additionally, in 2018 a new GHGRP reporter began reporting permanent mold emissions. The balance of the emissions for this industry segment was estimated based on previous Partner reporting (i.e., for Partners that did not report emissions through EPA's GHGRP) or were estimated by multiplying emission factors by the amount of metal produced or consumed. Partners who did not report through EPA's GHGRP were assumed to have continued

 $^{^{\}rm b}$ Weighted average that includes an estimated emission factor of 5.2 kg SF₆ per metric ton of magnesium for die casters that do not participate in the Partnership.

to emit SF₆ at the last reported level, which was from 2010 in most cases, unless publicly available sources indicated that these facilities have closed or otherwise eliminated SF₆ emissions from magnesium production (ARB 2015). Many Partners that did report through the GHGRP showed increases in SF₆ emissions driven by increased production related to a continued economic recovery after the 2008 recession. One Partner in particular reported an anonymously large increase in SF₆ emissions from 2010 to 2011, further driving increases in emissions between the two time periods of inventory estimates. All Partners were assumed to have continued to consume magnesium at the last reported level. Where the total metal consumption estimated for the Partners fell below the U.S. total reported by USGS, the difference was multiplied by the emission factors discussed in the section above, i.e., nonpartner emission factors. For the other types of production and processing (i.e., permanent mold, wrought, and anode casting), emissions were estimated by multiplying the industry emission factors with the metal production or consumption statistics obtained from USGS (USGS 2022). USGS data for 2021 were not yet available at the time of the analysis, so the 2020 values were held constant through 2021 as an estimate.

Emissions of carrier gases for permanent mold, wrought, and anode processes were estimated using an approach consistent with the 1999 through 2010 time series.

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021. 2006 IPCC Guidance methodologies were used throughout the timeseries, mainly either a Tier 2 or Tier 3 approach depending on available data.

Uncertainty

Uncertainty surrounding the total estimated emissions in 2021 is attributed to the uncertainties around SF₆, HFC-134a, and CO₂ emission estimates. To estimate the uncertainty surrounding the estimated 2021 SF₀ emissions from magnesium production and processing, the uncertainties associated with three variables were estimated: (1) emissions reported by magnesium producers and processors for 2021 through EPA's GHGRP, (2) emissions estimated for magnesium producers and processors that reported via the Partnership in prior years but did not report 2021 emissions through EPA's GHGRP, and (3) emissions estimated for magnesium producers and processors that did not participate in the Partnership or report through EPA's GHGRP. An uncertainty of 5 percent was assigned to the emissions (usage) data reported by each GHGRP reporter for all the cover and carrier gases (per the 2006 IPCC Guidelines). If facilities did not report emissions data during the current reporting year through EPA's GHGRP, SF₆ emissions data were held constant at the most recent available value reported through the Partnership. The uncertainty associated with these values was estimated to be 30 percent for each year of extrapolation (per the 2006 IPCC Guidelines). The uncertainty of the total inventory estimate remained relatively constant between 2020 and 2021.

Alternate cover gas and carrier gases data was set equal to zero if the facilities did not report via the GHGRP. For those industry processes that are not represented in the Partnership, such as permanent mold and wrought casting, SF₆ emissions were estimated using production and consumption statistics reported by USGS and estimated process-specific emission factors (see Table 4-100). The uncertainties associated with the emission factors and USGS-reported statistics were assumed to be 75 percent and 25 percent, respectively. Emissions associated with die casting and sand casting activities utilized emission factors based on Partner reported data with an uncertainty of 75 percent. In general, where precise quantitative information was not available on the uncertainty of a parameter, a conservative (upper-bound) value was used.

Additional uncertainties exist in these estimates that are not addressed in this methodology, such as the basic assumption that SF₆ neither reacts nor decomposes during use. The melt surface reactions and high temperatures associated with molten magnesium could potentially cause some gas degradation. Previous measurement studies have identified SF₆ cover gas degradation in die casting applications on the order of 20 percent (Bartos et al. 2007). Sulfur hexafluoride may also be used as a cover gas for the casting of molten aluminum with high magnesium content; however, the extent to which this technique is used in the United States is unknown.

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-100. Total emissions associated with magnesium production and processing were estimated to be between 1.08 and 1.24 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 7.0 percent below to 7.1 percent above the 2021 emission estimate of 1.16 MMT CO₂ Eq. The uncertainty estimates for 2021 are slightly lower to the uncertainty reported for 2020 in the previous Inventory. This decrease in uncertainty is attributed to the increased proportion of SF₆ emissions that were calculated using data from GHGRP reporting facilities, which are more accurate than emissions calculated using proxy or estimation methods for non-reporters.

Table 4-100: Approach 2 Quantitative Uncertainty Estimates for SF₆, HFC-134a and CO₂ Emissions from Magnesium Production and Processing (MMT CO₂ Eq. and Percent)

Carras	Con	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimat						
Source Gas		(MMT CO₂ Eq.)	(MMT	CO ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Magnesium	SF ₆ , HFC-	1.2	1.1	1.2	-7.0%	7.1%			
Production	134a, CO ₂	1.2	1.1	1.2	-7.0%	7.170			

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of 2006 IPCC Guidelines as described in the introduction of the IPPU chapter (see Annex 8 for more details). For the GHGRP data, EPA verifies annual facilitylevel reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). 67 Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

GHGRP-reported emissions for CO₂ and SF₆ were updated for a die casting and a permanent mold facility for their 2020 reported emissions data resulting in resulting in decreased 2020 CO2 and SF6 emissions. Another die casting facility that was a late reporters to the GHGRP have had emissions back casted to 2001, increasing SF₆ emissions in those years (Kramer 2000). CO₂ emissions from one facility which was previously interpolated for 2014 has emissions data available on the FLIGHT tool and has been updated accordingly, resulting in a decrease in 2014 CO₂ emissions.

One facility's Fluorinated Ketone and CO2 emissions from 2016 were updated as an interpolation between reported 2015 and 2017 emissions, in alignment with previous updates to that facility's SF₁ emissions, leading to increased CO₂ emissions and decreased fluorinated ketone emissions. HFC-134a emissions from one facility which were not previously accounted in the estimate summary have been accounted for, leading to an increase in 2019 HFC-134a emissions. CO₂ emissions from one facility were previously held constant from their 2018 emissions, further research indicated that holding emissions from their 2017 emissions was more reflective of current conditions and was updated, resulting in increased 2019 and 2020 CO₂ emissions from that facility.

⁶⁷ GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015- 07/documents/ghgrp verification factsheet.pdf.

In addition, for the current Inventory, estimates of gas emissions from SF₆, HFC-134a, CO₂, and Fluorinated Ketone have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP value for SF₆ increased from 22,800 to 23,500 leading to an increase in emissions. The GWP value for HFC-13a decreased from 1,430 to 1,300 leading to a decrease in emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in SF₆ emissions was a 3.1 percent increase and the average annual change in HFC-134a emissions was 4.5 percent decrease for the time series. While the GWP value CO₂ remained the same, calculations of CO₂ emissions from Permanent Mold, Wrought, and Anode Emissions tied to emissions of SF₆ led to 0.02 percent increase in CO₂ emissions. Overall, emissions from magnesium production and processing increased over the time series. The net impact from these updates was an average annual 2.8 percent increase in emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Cover gas research conducted over the last decade has found that SF₆ used for magnesium melt protection can have degradation rates on the order of 20 percent in die casting applications (Bartos et al. 2007). Current emission estimates assume (per the 2006 IPCC Guidelines) that all SF₆ utilized is emitted to the atmosphere. Additional research may lead to a revision of the 2006 IPCC Guidelines to reflect this phenomenon and until such time, developments in this sector will be monitored for possible application to the Inventory methodology.

Additional emissions are generated as byproducts from the use of alternate cover gases, which are not currently accounted for. Research on this topic is developing, and as reliable emission factors become available, these emissions will be incorporated into the Inventory.

An additional die casting facility that was a late reporter to the GHGRP will have emissions back cast based on further outreach to determine what years they started die casting. This value will be taken out of the non-reported emissions from die casters for the years affected.

Lead Production (CRF Source Category 2C5)

In 2021, lead was produced in the United States using only secondary production processes. Until 2014, lead production in the United States involved both primary and secondary processes—both of which emit carbon dioxide (CO2) (Sjardin 2003). Emissions from fuels consumed for energy purposes during the production of lead are accounted for in the Energy chapter.

Primary production of lead through the direct smelting of lead concentrate produces CO₂ emissions as the lead concentrates are reduced in a furnace using metallurgical coke (Sjardin 2003). Primary lead production, in the form of direct smelting, previously occurred at a single smelter in Missouri. This primary lead smelter was closed at the end of 2013, and a small amount of residual lead was processed during demolition of the facility in 2014 (USGS 2015). Beginning in 2015, primary lead production no longer occurred in the United States.

Similar to primary lead production, CO₂ emissions from secondary lead production result when a reducing agent, usually metallurgical coke, is added to the smelter to aid in the reduction process. Carbon dioxide emissions from secondary production also occur through the treatment of secondary raw materials (Sjardin 2003). Secondary production primarily involves the recycling of lead acid batteries and post-consumer scrap at secondary smelters. Secondary lead production in the United States has fluctuated over the past 20 years, reaching a high of 1,180,000 metric tons in 2007, and declined for three successive years between 2019 and 2021. In 2021, secondary lead production accounted for 100 percent of total U.S. lead production. The lead-acid battery industry accounted for about 92 percent of the reported U.S. lead consumption in 2021 (USGS 2022b).

In 2021, secondary lead production in the United States decreased by approximately 4 percent compared to 2020, due to the closure of a secondary lead smelter in South Carolina (Battery Industry 2021) and reduced production from several other secondary lead smelters (USGS 2022b). Secondary lead production in 2021 is 7 percent higher than in 1990 (USGS 1994 and 2022b). The United States has become more reliant on imported refined lead, owing to the closure of the last primary lead smelter in 2013. Exports of spent starting-lighting-ignition (SLI) batteries decreased between 2014 and 2017, and subsequently recovered beginning in 2018. Exports were 14 percent higher in the first 9 months of 2021 compared to the same time period in 2014 (USGS 2015 through 2022b). In the first 9 months of 2021, 25.5 million spent SLI lead-acid batteries were exported, 29 percent more than that in the same time period in 2020 (USGS 2022b).

Emissions of CO₂ from lead production in 2021 were 0.4 MMT CO₂ Eq. (446 kt), which is a 4 percent decrease compared to 2020 and a 14 percent decrease compared to 1990 (see Table 4-101 and Table 4-102).

The United States was the third largest mine producer of lead in the world, behind China and Australia, and accounted for approximately 7 percent of world production in 2021 (USGS 2022b).

Table 4-101: CO₂ Emissions from Lead Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4

Table 4-102: CO₂ Emissions from Lead Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Lead Production	516	553	513	527	531	464	446

Methodology and Time-Series Consistency

The methods used to estimate emissions for lead production⁶⁸ are based on Sjardin's work (Sjardin 2003) for lead production emissions and Tier 1 methods from the 2006 IPCC Guidelines. The Tier 1 equation is as follows:

Equation 4-15: 2006 IPCC Guidelines Tier 1: CO₂ Emissions From Lead Production (Equation 4.32)

$$CO_2$$
 Emissions = $(DS \times EF_{DS}) + (S \times EF_S)$

where,

Lead produced by direct smelting, metric ton DS

S Lead produced from secondary materials

EFDS Emission factor for direct smelting, metric tons CO₂/metric ton lead product

EFs Emission factor for secondary materials, metric tons CO₂/metric ton lead product

For primary lead production using direct smelting, Sjardin (2003) and the 2006 IPCC Guidelines provide an emission factor of 0.25 metric tons CO₂/metric ton lead. For secondary lead production, Sjardin (2003) and the 2006 IPCC Guidelines provide an emission factor of 0.25 metric tons CO₂/metric ton lead for direct smelting, as well as an

⁶⁸ EPA has not integrated aggregated facility-level Greenhouse Gas Reporting Program (GHGRP) information to inform these estimates. The aggregated information (e.g., activity data and emissions) associated with Lead Production did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

emission factor of 0.2 metric tons CO₂/metric ton lead produced for the treatment of secondary raw materials (i.e., pretreatment of lead acid batteries). Since the secondary production of lead involves both the use of the direct smelting process and the treatment of secondary raw materials, Sjardin recommends an additive emission factor to be used in conjunction with the secondary lead production quantity. The direct smelting factor (0.25) and the sum of the direct smelting and pretreatment emission factors (0.45) are multiplied by total U.S. primary and secondary lead production, respectively, to estimate CO₂ emissions.

Filed 01/31/24

The production and use of coking coal for lead production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO2 from Fossil Fuel Combustion (Section 3.1 Fossil Fuel Combustion (CRF Source Category 1A)) and Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

The 1990 through 2021 activity data for primary and secondary lead production (see Table 4-103) were obtained from the U.S. Geological Survey (USGS 1995 through 2022b).

Table 4-103: Lead Production (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Primary	404,000	143,000	0	0	0	0	0
Secondary	922,000	1,150,000	1,140,000	1,170,000	1,180,000	1,030,000	990,000

Methodological approaches discussed below were applied to applicable years to ensure time-series consistency in emissions from 1990 through 2021.

Uncertainty

Case 5:23-cv-00304-H

Uncertainty associated with lead production relates to the emission factors and activity data used. The direct smelting emission factor used in primary production is taken from Sjardin (2003) who averaged the values provided by three other studies (Dutrizac et al. 2000; Morris et al. 1983; Ullman 1997). For secondary production, Sjardin (2003) added a CO2 emission factor associated with battery treatment. The applicability of these emission factors to plants in the United States is uncertain. EPA assigned an uncertainty range of ±20 percent for these emission factors, and using this suggested uncertainty provided in Table 4.23 of the 2006 IPCC Guidelines for a Tier 1 emission factor by process type is appropriate based on expert judgment (RTI 2023).

There is also a smaller level of uncertainty associated with the accuracy of primary and secondary production data provided by the USGS which is collected via voluntary surveys; the uncertainty of the activity data is a function of the reliability of reported plant-level production data and the completeness of the survey response. EPA currently uses an uncertainty range of ±10 percent for primary and secondary lead production, and using this suggested uncertainty provided in Table 4.23 of the 2006 IPCC Guidelines for Tier 1 national production data is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-104. Lead production CO₂ emissions in 2021 were estimated to be between 0.4 and 0.5 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 15 percent below and 15 percent above the emission estimate of 0.4 MMT CO₂ Eq.

Table 4-104: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Lead **Production (MMT CO₂ Eq. and Percent)**

Course	Cos	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a						
Source	urce Gas (MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)					
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Lead Production	CO ₂	0.4	0.4	0.5	-15%	+15%			

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Initial review of activity data show that EPA's GHGRP Subpart R lead production data and resulting emissions are fairly consistent with those reported by USGS. EPA is still reviewing available GHGRP data, reviewing QC analysis to understand differences in data reporting (i.e., threshold implications), and assessing the possibility of including this planned improvement in future Inventory reports (see Planned Improvements section below). Currently, GHGRP data are used for QA purposes only.

Recalculations Discussion

Recalculations were implemented for 2014, 2018, 2019, and 2020, based on revised USGS data for secondary lead production. Compared to the previous Inventory, emissions increased by 4 percent (18 kt CO_2) for 2014, 3 percent (14 kt CO_2) for 2018, and less than 1 percent (4 kt CO_2) for 2019. Emissions decreased by 6 percent (31 kt CO_2) for 2020.

Planned Improvements

Pending resources and prioritization of improvements for more significant sources, EPA will continue to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates and category-specific QC for the Lead Production source category, in particular considering completeness of reported lead production given the reporting threshold. Particular attention will be made to ensuring time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon. ⁶⁹

4.22 Zinc Production (CRF Source Category 2C6)

Zinc production in the United States consists of both primary and secondary processes. Of the primary and secondary processes currently used in the United States, only the electrothermic and Waelz kiln secondary processes result in non-energy carbon dioxide (CO_2) emissions (Viklund-White 2000). Emissions from fuels consumed for energy purposes during the production of zinc are accounted for in the Energy chapter.

_

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

⁶⁹ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

The majority of zinc produced in the United States is used for galvanizing. Galvanizing is a process where zinc coating is applied to steel in order to prevent corrosion. Zinc is used extensively for galvanizing operations in the automotive and construction industry. Zinc is also used in the production of zinc alloys and brass and bronze alloys (e.g., brass mills, copper foundries, and copper ingot manufacturing). Zinc compounds and dust are also used, to a lesser extent, by the agriculture, chemicals, paint, and rubber industries.

Document 15-20

Production of zinc can be conducted with a range of pyrometallurgical (e.g., electrothermic furnace, Waelz kiln, flame reactor, batch retorts, Pinto process, and PIZO process) and hydrometallurgical (e.g., hydrometallurgical recovery, solvent recovery, solvent extraction-electrowinning, and electrolytic) processes. Hydrometallurgical production processes are assumed to be non-emissive since no carbon is used in these processes (Sjardin 2003). Primary production in the United States is conducted through the electrolytic process, while secondary techniques include the electrothermic and Waelz kiln processes, as well as a range of other processes. Worldwide primary zinc production also employs a pyrometallurgical process using an Imperial Smelting Furnace; however, this process is not used in the United States (Sjardin 2003).

In the electrothermic process, roasted zinc concentrate and secondary zinc products enter a sinter feed where they are burned to remove impurities before entering an electric retort furnace. Metallurgical coke is added to the electric retort furnace as a carbon-containing reductant. This concentration step, using metallurgical coke and high temperatures, reduces the zinc oxides and produces vaporized zinc, which is then captured in a vacuum condenser. This reduction process also generates non-energy CO₂ emissions.

$$ZnO + C \rightarrow Zn(gas) + CO_2$$
 (Reaction 1)
 $ZnO + CO \rightarrow Zn(gas) + CO_2$ (Reaction 2)

In the Waelz kiln process, electric arc furnace (EAF) dust, which is captured during the recycling of galvanized steel, enters a kiln along with a reducing agent (typically carbon-containing metallurgical coke). When kiln temperatures reach approximately 1,100 to 1,200 degrees Celsius, zinc fumes are produced, which are combusted with air entering the kiln. This combustion forms zinc oxide, which is collected in a baghouse or electrostatic precipitator, and is then leached to remove chloride and fluoride. The use of carbon-containing metallurgical coke in a hightemperature fuming process results in non-energy CO2 emissions. Through this process, approximately 0.33 metric tons of zinc is produced for every metric ton of EAF dust treated (Viklund-White 2000).

In the flame reactor process, a waste feed stream, which can include EAF dust, is processed in a high-temperature environment (greater than 2,000 °C) created by the combustion of natural gas or coal and oxygen-enriched air. Volatile metals, including zinc, are forced into the gas phase and drawn into a combustion chamber, where air is introduced and oxidation occurs. The metal oxide product is then collected in a dust collection system (EPA 1992).

In 2021, the only companies in the United States that used emissive technology to produce secondary zinc products were Befesa Holding US Inc (Befesa) and Steel Dust Recycling (SDR). The secondary zinc facilities operated by Befesa were acquired from American Zinc Recycling (AZR) (formerly "Horsehead Corporation") in 2021. PIZO Operating Company, LLC (PIZO) operated a secondary zinc production facility that processed EAF dust in Blytheville, AR from 2009 to 2012.

For Befesa, EAF dust is recycled in Waelz kilns at their Calumet, IL; Palmerton, PA; Rockwood, TN; and Barnwell, SC facilities. The former AZR facility in Beaumont, TX processed EAF dust via flame reactor from 1993 through 2009 (AZR 2021; Horsehead 2014). These Waelz kiln and flame reactor facilities produce intermediate zinc products (crude zinc oxide or calcine). Prior to 2014, most of output from these facilities were transported to their Monaca, PA facility where the products were smelted into refined zinc using electrothermic technology. In April 2014, the Monaca smelter was permanently closed and replaced by a new facility in Mooresboro, NC in 2014.

The Mooresboro facility uses a hydrometallurgical process (i.e., solvent extraction with electrowinning technology) to produce zinc products, which is assumed to be non-emissive as described above. Production at the Mooresboro facility was idled in April 2016 and re-started in March 2020, with plans to be at full capacity by 2021 (Recycling Today 2020). Direct consumption of coal, coke, and natural gas were replaced with electricity consumption (Horsehead 2012b). The Mooresboro facility uses leaching and solvent extraction (SX) technology combined with

electrowinning, melting, and casting technology. In this process, Waelz Oxide (WOX) is first washed in water to remove soluble elements such as chlorine, potassium, and sodium, and then is leached in a sulfuric acid solution to dissolve the contained zinc creating a pregnant liquor solution (PLS). The PLS is then processed in a solvent extraction step in which zinc is selectively extracted from the PLS using an organic solvent creating a purified zincloaded electrolyte solution. The loaded electrolyte solution is then fed into the electrowinning process in which electrical energy is applied across a series of anodes and cathodes submerged in the electrolyte solution causing the zinc to deposit on the surfaces of the cathodes. As the zinc metal builds up on these surfaces, the cathodes are periodically harvested in order to strip the zinc from their surfaces (Horsehead 2015).

SDR recycles EAF dust into intermediate zinc products using Waelz kilns and sells the intermediate products to companies who smelt it into refined products.

Emissions of CO₂ from zinc production in 2021 were estimated to be 1.0 MMT CO₂ Eq. (969 kt CO₂) (see Table 4-105 and Table 4-106). All 2021 CO₂ emissions resulted from secondary zinc production processes. Emissions from zinc production in the United States have increased overall since 1990 due to a gradual shift from non-emissive primary production to emissive secondary production. In 2021, emissions were estimated to be 53 percent higher than they were in 1990. Emissions decreased 1 percent from 2020 levels.

In 2021, global zinc mine production, or primary production, recovered from the reduced output experienced in 2020 due largely to the COVID-19 pandemic. U.S. primary zinc production mirrored this global trend. While total refined zinc production increased in 2020 due to the reopening of an idled secondary zinc refinery, consumption of refined zinc decreased in association with a decline in the U.S. steel industry as a result of the COVID-19 pandemic. Refined zinc production increased in 2021, along with zinc consumption (USGS 2022).

Table 4-105: CO₂ Emissions from Zinc Production (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0

Table 4-106: CO₂ Emissions from Zinc Production (kt CO₂)

Year	1990	2005	2017	2018	2019	2020	2021
Zinc Production	632	1,030	900	999	1,026	977	969

In 2021, United States primary and secondary refined zinc production were estimated to total 220,000 metric tons (USGS 2022) (see Table 4-107). Domestic zinc mine production increased in 2021 compared to 2020 owing partially to a decrease in production at the Red Dog Mine in Alaska and the closure of the Pend Oreille Mine in Washington State in July 2019. Primary zinc production (primary slab zinc) in 2018 is used as an estimate for 2019 through 2021 due to the lack of available data. Secondary zinc production in 2020 increased by 250 percent compared to 2019 and was largely influenced by the reopening of the idled AZR secondary zinc refinery in Mooresboro, NC in March 2020 (USGS 2021; AZP 2021). From 2020 to 2021, secondary zinc production increased by 51 percent. Secondary zinc production from the reopened facility was estimated by subtracting estimated primary zinc production from the total zinc production value obtained from the USGS Minerals Yearbook: Zinc. Production of secondary zinc reached its lowest point in the time series in 2019, following the closure of the Monaca, PA smelter in 2014 and technical and environmental issues with the Mooresboro, NC facility which reopened in 2020, as noted above.

Table 4-107: Zinc Production (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Primary	262,704	191,120	117,000	101,000	101,000	101,000	101,000
Secondary	95,708	156,000	15,000	15,000	14,000	79,000	119,000
Total	358,412	347,120	132,000	116,000	115,000	180,000	220,000

Methodology and Time-Series Consistency

The methods used to estimate non-energy CO_2 emissions from zinc production⁷⁰ using the electrothermic primary production and Waelz kiln secondary production processes are based on Tier 1 methods from the 2006 IPCC Guidelines (IPCC 2006). The Tier 1 equation used to estimate emissions from zinc production is as follows:

Equation 4-16: 2006 IPCC Guidelines Tier 1: CO₂ Emissions From Zinc Production (Equation 4.33)

 $E_{CO2} = Zn \times EF_{default}$

where,

E_{CO2} = CO₂ emissions from zinc production, metric tons

Zn = Quantity of zinc produced, metric tons

EF_{default} = Default emission factor, metric tons CO₂/metric ton zinc produced

The Tier 1 emission factors provided by IPCC for Waelz kiln-based secondary production were derived from metallurgical coke consumption factors and other data presented in Vikland-White (2000). These coke consumption factors as well as other inputs used to develop the Waelz kiln emission factors are shown below. IPCC does not provide an emission factor for electrothermic processes due to limited information; therefore, the Waelz kiln-specific emission factors were also applied to zinc produced from electrothermic processes. Starting in 2014, refined zinc produced in the United States used hydrometallurgical processes and is assumed to be non-emissive.

For Waelz kiln-based production, IPCC recommends the use of emission factors based on EAF dust consumption, if possible, rather than the amount of zinc produced since the amount of reduction materials used is more directly dependent on the amount of EAF dust consumed. Since only a portion of emissive zinc production facilities consume EAF dust, the emission factor based on zinc production is applied to the non-EAF dust consuming facilities, while the emission factor based on EAF dust consumption is applied to EAF dust consuming facilities.

The Waelz kiln emission factor based on the amount of zinc produced was developed based on the amount of metallurgical coke consumed for non-energy purposes per ton of zinc produced (i.e., 1.19 metric tons coke/metric ton zinc produced) (Viklund-White 2000), and the following equation:

Equation 4-17: Waelz Kiln CO₂ Emission Factor for Zinc Produced

 $EF_{Waelz~Kiln} = \frac{1.19~metric~tons~coke}{metric~tons~zinc} \times \frac{0.85~metric~tons~C}{metric~tons~coke} \times \frac{3.67~metric~tons~CO_2}{metric~tons~C} = \frac{3.70~metric~tons~CO_2}{metric~tons~zinc}$

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. Refined zinc production levels for AZR's Monaca, PA facility (utilizing electrothermic technology) were available from the company for years 2005 through 2013 (Horsehead 2008, 2011, 2012, 2013, and 2014). The Monaca facility was permanently shut down in April 2014 and replaced by AZR's new facility in Mooresboro, NC. The new facility uses hydrometallurgical process to produce refined zinc products. Hydrometallurgical production processes are assumed to be non-emissive since no carbon is used in these processes (Sjardin 2003).

Metallurgical coke consumption for non-EAF dust consuming facilities for 1990 through 2004 were extrapolated using the percentage change in annual refined zinc production at secondary smelters in the United States, as provided by the U.S. Geological Survey (USGS) *Minerals Yearbook: Zinc* (USGS 1995 through 2006). Metallurgical

-

⁷⁰ EPA has not integrated aggregated facility-level Greenhouse Gas Reporting Program (GHGRP) information to inform these estimates. The aggregated information (e.g., activity data and emissions) associated with Zinc Production did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

coke consumption for 2005 through 2013 were based on the secondary zinc production values obtained from the Horsehead Corporation Annual Report Form 10-K: 2005 through 2008 from the 2008 10-K (Horsehead Corp 2009); 2009 and 2010 from the 2010 10-K (Horsehead Corp. 2011); and 2011 through 2013 from the associated 10-K (Horsehead Corp. 2012a, 2013, 2014). Metallurgical coke consumption levels for 2014 and later were zero due to the closure of the AZR (formerly "Horsehead Corporation") electrothermic furnace facility in Monaca, PA. The secondary zinc produced values for each year were then multiplied by the 3.70 metric tons CO₂/metric ton zinc produced emission factor to develop CO₂ emission estimates for the AZR electrothermic furnace facility.

The Waelz kiln emission factor based on the amount of EAF dust consumed was developed based on the amount of metallurgical coke consumed per ton of EAF dust consumed (i.e., 0.4 metric tons coke/metric ton EAF dust consumed) (Viklund-White 2000), and the following equation:

Equation 4-18: Waelz Kiln CO₂ Emission Factor for EAF Dust Consumed

$$EF_{EAF\ Dust} = \frac{0.4\ metric\ tons\ coke}{metric\ tons\ EAF\ Dust} \times \frac{0.85\ metric\ tons\ C}{metric\ tons\ coke} \times \frac{3.67\ metric\ tons\ CO_2}{metric\ tons\ C} = \frac{1.24\ metric\ tons\ CO_2}{metric\ tons\ EAF\ Dust}$$

Metallurgical coke consumption for EAF dust consuming facilities for 1990 through 2021 were calculated based on the values of EAF dust consumed. The values of EAF dust consumed for Befesa, SDR, and PIZO are explained below. The total amount of EAF dust consumed by the Waelz kilns currently operated by Befesa was available from AZR (formerly "Horsehead Corporation") in financial reports for years 2006 through 2015 (Horsehead 2007, 2008, 2010a, 2011, 2012a, 2013, 2014, 2015, and 2016), from correspondence with AZR for 2016through 2019 (AZR 2020), and from correspondence with Befesa for 2020 and 2021 (Befesa 2022). The EAF dust consumption values for each year were then multiplied by the 1.24 metric tons CO₂/metric ton EAF dust consumed emission factor to develop CO₂ emission estimates for Befesa's Waelz kiln facilities.

The amount of EAF dust consumed by SDR and their total production capacity were obtained from SDR's facility in Alabama for the years 2011 through 2021 (SDR 2012, 2014, 2015, 2017, 2018, 2021, 2022). The SDR facility has been operational since 2008, underwent expansion in 2011 to include a second unit (operational since early- to mid-2012), and expanded its capacity again in 2017 (SDR 2018). Annual consumption data for SDR was not publicly available for the years 2008, 2009, and 2010. These data were estimated using data for AZR's Waelz kilns for 2008 through 2010 (Horsehead 2007, 2008, 2010a, 2010b, 2011). Annual capacity utilization ratios were calculated using AZR's annual consumption and total capacity for the years 2008 through 2010. AZR's annual capacity utilization ratios were multiplied with SDR's total capacity to estimate SDR's consumption for each of the years, 2008 through 2010 (SDR 2013). The 1.24 metric tons CO₂/metric ton EAF dust consumed emission factor was then applied to SDR's estimated EAF dust consumption to develop CO₂ emission estimates for those Waelz kiln facilities.

PIZO's facility in Arkansas was operational from 2009 to 2012 (PIZO 2021). The amount of EAF dust consumed by PIZO's facility for 2009 through 2012 was not publicly available. EAF dust consumption for PIZO's facility for 2009 and 2010 were estimated by calculating annual capacity utilization of AZR's Waelz kilns and multiplying this utilization ratio by PIZO's total capacity (PIZO 2012). EAF dust consumption for PIZO's facility for 2011 through 2012 were estimated by applying the average annual capacity utilization rates for AZR and SDR (Grupo PROMAX) to PIZO's annual capacity (Horsehead 2012; SDR 2012; PIZO 2012). The 1.24 metric tons CO₂/metric ton EAF dust consumed emission factor was then applied to PIZO's estimated EAF dust consumption to develop CO₂ emission estimates for those Waelz kiln facilities.

The production and use of coking coal for zinc production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO₂ from Fossil Fuel Combustion (CRF Source Category 1A)) and Annex 2.1, Methodology for Estimating Emissions of CO₂ from Fossil Fuel Combustion.

Beginning with the 2017 USGS *Minerals Commodity Summary: Zinc*, United States primary and secondary refined zinc production were reported as one value, total refined zinc production. Prior to this publication, primary and secondary refined zinc production statistics were reported separately. For years 2016 through 2021, only one

facility produced primary zinc. Primary zinc produced from this facility was subtracted from the USGS 2016 to 2021 total zinc production statistic to estimate secondary zinc production for these years. Primary zinc production data was not available for 2019 through 2021 and was estimated using 2018 values (Nyrstar 2019).

Uncertainty

The uncertainty associated with these estimates is two-fold, relating to activity data and emission factors used.

First, there is uncertainty associated with the amount of EAF dust consumed in the United States to produce secondary zinc using emission-intensive Waelz kilns. The estimate for the total amount of EAF dust consumed in Waelz kilns is based on combining the totals for (1) the EAF dust consumption value obtained for the kilns currently operated by Befesa (formerly operated by AZR or Horsehead Corporation) and (2) an EAF dust consumption value obtained from the Waelz kiln facility operated by SDR. For the 1990 through 2015 estimates, EAF dust consumption values for the kilns currently operated by Befesa were obtained from annual financial reports to the Securities and Exchange Commission (SEC) by AZR. In 2016, AZR reorganized as a private company and ceased providing annual reports to the SEC (Recycling Today 2017). EAF dust consumption values for subsequent years from the Befesa kilns and SDR have been obtained from personal communication with facility representatives. Since actual EAF dust consumption information is not available for PIZO's facility (2009 through 2010) and SDR's facility (2008 through 2010), the amount is estimated by multiplying the EAF dust recycling capacity of the facility (available from the company's website) by the capacity utilization factor for AZR (which was available from Horsehead Corporation financial reports). The EAF dust consumption for PIZO's facility for 2011 through 2012 was estimated by multiplying the average capacity utilization factor developed from AZR and SDR's annual capacity utilization rates by PIZO's EAF dust recycling capacity. Therefore, there is uncertainty associated with the assumption used to estimate PIZO's annual EAF dust consumption values for 2009 through 2012 and SDR's annual EAF dust consumption values for 2008 through 2010. EPA uses an uncertainty range of ±5 percent for these EAF dust consumption data inputs, based upon expert judgment from the USGS commodity specialist.

Second, there is uncertainty associated with the emission factors used to estimate CO₂ emissions from secondary zinc production processes. The Waelz kiln emission factors are based on materials balances for metallurgical coke and EAF dust consumed as provided by Viklund-White (2000). Therefore, the accuracy of these emission factors depend upon the accuracy of these materials balances. Data limitations prevented the development of emission factors for the electrothermic process. Therefore, emission factors for the Waelz kiln process were applied to both electrothermic and Waelz kiln production processes. EPA assigned an uncertainty range of ±20 percent for the Tier 1 Waelz kiln emission factors, which are provided by Viklund-White in the form of metric tons of coke per metric ton of EAF dust consumed and metric tons of coke per metric ton of zinc produced, and using this suggested uncertainty provided in Table 4.25 of the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023). In order to convert coke consumption rates to CO₂ emission rates, values for the heat and carbon content of coke were obtained from Table 4.2 – Tier 2 of the 2006 IPCC Guidelines. An uncertainty range of ±10 percent was assigned to these coke data elements, and using these suggested uncertainties provided in Table 4.25 of the 2006 IPCC Guidelines, Tier 2 - National Reducing Agent & Process Materials Data is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-108. Zinc production CO₂ emissions from 2021 were estimated to be between 0.8 and 1.2 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 18 percent below and 21 percent above the emission estimate of 1.0 MMT CO₂ Eq.

Table 4-108: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Zinc Production (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	ission Estimate Uncertainty Range Relative to Emission Estima						
		(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Zinc Production	CO ₂	1.0	0.8	1.2	-18%	+21%			

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Recalculations Discussion

Recalculations were performed for the year 2020 based on updated EAF dust consumption data. Compared to the previous Inventory, emissions from zinc production decreased by 3 percent (31 kt CO₂).

Planned Improvements

Pending resources and prioritization of improvements for more significant sources, EPA will continue to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates and category-specific QC for the Zinc Production source category, in particular considering completeness of reported zinc production given the reporting threshold. Given the small number of facilities in the United States, particular attention will be made to risks for disclosing CBI and ensuring time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon. ⁷¹ This is a long-term planned improvement, and EPA is still assessing the possibility of including this improvement in future Inventory reports.

4.23 Electronics Industry (CRF Source Category 2E)

The electronics industry uses multiple greenhouse gases in its manufacturing processes. In semiconductor manufacturing, these include long-lived fluorinated greenhouse gases used for plasma etching and chamber cleaning (CRF Source Category 2E1), fluorinated heat transfer fluids used for temperature control and other applications (CRF Source Category 2E4), and nitrous oxide (N_2O) used to produce thin films through chemical vapor deposition and in other applications (reported under CRF Source Category 2H3). Similar to semiconductor manufacturing, the manufacturing of micro-electro-mechanical systems (MEMS) devices (reported under CRF

4-120 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

⁷¹ See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI Technical Bulletin 1.pdf.

Source Category 2E5 Other) and photovoltaic (PV) cells (CRF Source Category 2E3) requires the use of multiple long-lived fluorinated greenhouse gases for various processes.

The gases most commonly employed in the electronics industry are trifluoromethane (hydrofluorocarbon (HFC)-23 or CHF₃), perfluoromethane (CF₄), perfluoroethane (C₂F₆), nitrogen trifluoride (NF₃), and sulfur hexafluoride (SF₆), although other fluorinated compounds such as perfluoropropane (C₃F₀) and perfluorocyclobutane (c-C₄F₀) are also used. The exact combination of compounds is specific to the process employed.

In addition to emission estimates for these seven commonly used fluorinated gases, this Inventory contains emissions estimates for N₂O and other HFCs and unsaturated, low-GWP PFCs including C₅F8, C₄F6, HFC-32, HFC-41, and HFC-134a. These additional HFCs and PFCs are emitted from etching and chamber cleaning processes in much smaller amounts, accounting for 0.02 percent of emissions (in CO₂ Eq.) from these processes.

For semiconductors, a single 300 mm silicon wafer that yields between 400 to 600 semiconductor products (devices or chips) may require more than 100 distinct fluorinated-gas-using process steps, principally to deposit and pattern dielectric films. Plasma etching (or patterning) of dielectric films, such as silicon dioxide and silicon nitride, is performed to provide pathways for conducting material to connect individual circuit components in each device. The patterning process uses plasma-generated fluorine atoms, which chemically react with exposed dielectric film to selectively remove the desired portions of the film. The material removed as well as undissociated fluorinated gases flow into waste streams and, unless emission abatement systems are employed, into the atmosphere. Plasma enhanced chemical vapor deposition (PECVD) chambers, used for depositing dielectric films, are cleaned periodically using fluorinated and other gases. During the cleaning cycle the gas is converted to fluorine atoms in plasma, which etches away residual material from chamber walls, electrodes, and chamber hardware. Undissociated fluorinated gases and other products pass from the chamber to waste streams and, unless abatement systems are employed, into the atmosphere.

In addition to emissions of unreacted gases, some fluorinated compounds can also be transformed in the plasma processes into different fluorinated compounds which are then exhausted, unless abated, into the atmosphere. For example, when C₂F₆ is used in cleaning or etching, CF₄ is typically generated and emitted as a process byproduct. In some cases, emissions of the byproduct gas can rival or even exceed emissions of the input gas, as is the case for NF₃ used in remote plasma chamber cleaning, which often generates CF₄ as a byproduct.

Besides dielectric film etching and PECVD chamber cleaning, much smaller quantities of fluorinated gases are used to etch polysilicon films and refractory metal films like tungsten.

Nitrous oxide is used in manufacturing semiconductor devices to produce thin films by CVD and nitridation processes as well as for N-doping of compound semiconductors and reaction chamber conditioning (Doering 2000).

Liquid perfluorinated compounds are also used as heat transfer fluids (F-HTFs) for temperature control, device testing, cleaning substrate surfaces and other parts, and soldering in certain types of semiconductor manufacturing production processes. Leakage and evaporation of these fluids during use is a source of fluorinated gas emissions (EPA 2006). Unweighted F-HTF emissions consist primarily of perfluorinated amines, hydrofluoroethers, perfluoropolyethers (specifically, PFPMIEs), and perfluoroalkylmorpholines. Three percent or less consist of HFCs, PFCs, and SF6 (where PFCs are defined as compounds including only carbon and fluorine). With the exceptions of the hydrofluoroethers and most of the HFCs, all of these compounds are very long-lived in the atmosphere and have global warming potentials (GWPs) near 10,000.72

72 The GWP of PFPMIE, a perfluoropolyether used as an F-HTF, is included in the IPCC Fourth Assessment Report with a value of 10,300. The GWPs of the perfluorinated amines and perfluoroalkylmorpholines that are used as F-HTFs have not been evaluated in the peer-reviewed literature. However, evaluations by the manufacturer indicate that their GWPs are near 10,000 (78 FR 20632), which is expected given that these compounds are both saturated and fully fluorinated. EPA assigns a default GWP of 10,000 to compounds that are both saturated and fully fluorinated and that do not have chemical-specific GWPs in either the Fourth or the Fifth Assessment Reports.

MEMS and photovoltaic cell manufacturing require thin film deposition and etching of material with a thickness of one micron or more, so the process is less intricate and complex than semiconductor manufacturing. The manufacturing process is different than semiconductors, but generally employs similar techniques. Like semiconductors, MEMS and photovoltaic cell manufacturers use fluorinated compounds for etching, cleaning reactor chambers, and temperature control. CF₄, SF₆, and the Bosch process (which consists of alternating steps of SF₆ and C₄F₈) are used to manufacture MEMS (EPA 2010). Photovoltaic cell manufacturing predominately uses CF₄, to etch crystalline silicon wafers, and C₂F₆ or NF₃ during chamber cleaning after deposition of SiN_x films (IPCC 2006), although other F-GHGs may be used. Similar to semiconductor manufacturing, both MEMS and photovoltaic cell manufacturing use N₂O in depositing films and other manufacturing processes. MEMS and photovoltaic manufacturing may also employ HTFs for cooling process equipment (EPA 2010).

Emissions from all fluorinated greenhouse gases (including F-HTFs) and N₂O for semiconductors, MEMS and photovoltaic cells manducating are presented in Table 4-109 below for the years 1990, 2005, and the period 2017 to 2021. The rapid growth of the electronics industry and the increasing complexity (growing number of layers and functions)⁷³ of electronic products led to an increase in emissions of 152 percent between 1990 and 1999, when emissions peaked at 8.4 MMT CO₂ Eq. Emissions began to decline after 1999, reaching a low point in 2009 before rebounding to 2006 emission levels and more or less plateauing at the current level, which represents a 43 percent decline from 1999 to 2021. Together, industrial growth, adoption of emissions reduction technologies (including but not limited to abatement technologies) and shifts in gas usages resulted in a net increase in emissions of approximately 45 percent between 1990 and 2021. Total emissions from semiconductor manufacture in 2021 were higher than 2020 emissions, increasing by 10 percent, largely due to a large increase in SF₆ and CF₄ emissions. The increases in SF₆ are seen in facilities that manufacture 200 mm wafer size that do not have abatement systems installed. Increases in CF4 can be attributed to facilities that manufacture 300 mm wafer sizes that do have abatement systems installed.

For U.S. semiconductor manufacturing in 2021, total CO₂-equivalent emissions of all fluorinated greenhouse gases and N2O from deposition, etching, and chamber cleaning processes were estimated to be 4.8 MMT CO2 Eq. This is a decrease in emissions from 1999 of 43 percent, and an increase in emissions from 1990 of 45 percent. These trends are driven by the above stated reasons.

Photovoltaic cell and MEMS manufacturing emissions of all fluorinated greenhouse gases are in Table 4-109. While EPA has developed a simple methodology to estimate emissions from non-reporters and to back-cast emissions from these sources for the entire time series, there is very high uncertainty associated with these emission estimates.

The emissions reported by facilities manufacturing MEMS included emissions of C₂F₆, C₃F₈, c-C₄F₈, CF₄, HFC-23, NF₃, N_2O and SF_{6} , 74 and were equivalent to only 0.110 percent to 0.249 percent of the total reported emissions from electronics manufacturing in 2011 to 2021. F-GHG emissions, the primary type of emissions for MEMS, ranged from 0.0003 to 0.012 MMT CO₂ Eg. from 1991 to 2021. Based upon information in the World Fab Forecast (WFF), it appears that some GHGRP reporters that manufacture both semiconductors and MEMS are reporting their emissions as only from semiconductor manufacturing (GHGRP reporters must choose a single classification per fab). Emissions from non-reporters have not been estimated.

Total CO₂-equivalent emissions from manufacturing of photovoltaic cells were estimated to range from 0.0003 MMT CO₂ Eq. to 0.0330 MMT CO₂ Eq. from 1998 to 2021 and were equivalent to between 0.003 percent to 0.60

⁷³ Complexity is a term denoting the circuit required to connect the active circuit elements (transistors) on a chip. Increasing miniaturization, for the same chip size, leads to increasing transistor density, which, in turn, requires more complex interconnections between those transistors. This increasing complexity is manifested by increasing the levels (i.e., layers) of wiring, with each wiring layer requiring fluorinated gas usage for its manufacture.

⁷⁴ Gases not reported by MEMS manufacturers to the GHGRP are currently listed as "NE" in the CRF. Since no facilities report using these gases, emissions of these gases are not estimated for this sub-sector. However, there is insufficient data to definitively conclude that they are not used by non-reporting facilities.

percent of the total reported emissions from electronics manufacturing. F-GHG emissions, the primary type of emissions for photovoltaic cells, ranged from 0.0003 to 0.032 MMT CO₂ Eq. from 1998 to 2021. Emissions from manufacturing of photovoltaic cells were estimated using an emission factor developed from reported data from a single manufacturer between 2015 and 2016. This emission factor was then applied to production capacity estimates from non-reporting facilities. Reported emissions from photovoltaic cell manufacturing consisted of CF₄, C_2F_6 , c- C_4F_8 , CHF₃, NF₃, and N₂O.⁷⁵

Emissions of F-HTFs, grouped by HFCs, PFCs or SF₆ are presented in Table 4-109. Emissions of F-HTFs that are not HFCs, PFCs or SF₆ are not included in inventory totals and are included for informational purposes only.

Since reporting of F-HTF emissions began under EPA's GHGRP in 2011, total F-HTF emissions (reported and estimated non-reported) have fluctuated between 0.6 MMT CO₂ Eq. and 0.9 MMT CO₂ Eq., with an overall declining trend between 2011 to 2021. An analysis of the data reported to EPA's GHGRP indicates that F-HTF emissions account for anywhere between 11 percent and 17 percent of total annual emissions (F-GHG, N₂O and F-HTFs) from semiconductor manufacturing. ⁷⁶ Table 4-111 shows F-HTF emissions in tons by compound group based on reporting to EPA's GHGRP during years 2014 through 2020.77

Table 4-109: PFC, HFC, SF₆, NF₃, and N₂O Emissions from Electronics Industry (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
CF ₄	0.8	1.0	1.5	1.6	1.5	1.5	1.6
C_2F_6	1.8	1.8	1.1	1.0	0.9	0.8	0.8
C ₃ F ₈	+	0.1	0.1	0.1	0.1	0.1	0.1
C_4F_8	0.0	0.1	0.1	0.1	0.1	0.1	0.1
HFC-23	0.2	0.2	0.3	0.3	0.3	0.3	0.4
SF ₆	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF ₃	+	0.4	0.5	0.5	0.5	0.6	0.6
C_4F_6	+	+	+	+	+	+	+
C ₅ F ₈	+	+	+	+	+	+	+
CH_2F_2	+	+	+	+	+	+	+
CH ₃ F	+	+	+	+	+	+	+
CH ₂ FCF ₃	+	+	+	+	+	+	+
Total Semiconductors	3.3	4.3	4.3	4.4	4.1	4.1	4.5
CF ₄	0.0	+	+	+	+	+	+
C_2F_6	0.0	+	+	+	+	+	+
C ₃ F ₈	0.0	+	0.0	0.0	0.0	0.0	0.0
C_4F_8	0.0	+	+	+	+	+	+
HFC-23	0.0	+	+	+	+	+	+
SF ₆	0.0	+	+	+	+	+	+
NF ₃	0.0	0.0	+	+	+	+	+
Total MEMS	0.0	+	+	+	+	+	+
CF ₄	0.0	+	+	+	+	+	+

⁷⁵ Gases not reported by PV manufacturers to the GHGRP are currently listed as "NE" in the CRF. Since no facilities report using these gases, emissions of these gases are not estimated for this sub-sector. However, there is insufficient data to definitively conclude that they are not used by non-reporting facilities.

⁷⁶ Emissions data for HTFs (in tons of gas) from the semiconductor industry from 2011 through 2020 were obtained from the EPA GHGRP annual facility emissions reports.

⁷⁷ Many fluorinated heat transfer fluids consist of perfluoropolymethylisopropyl ethers (PFPMIEs) of different molecular weights and boiling points that are distilled from a mixture. "BP 200 °C" (and similar terms below) indicate the boiling point of the fluid in degrees Celsius. For more information, see https://www.regulations.gov/document?D=EPA-HQ-OAR-2009-0927-0276.

C_2F_6	0.0	+	+	+	+	+	+
C_4F_8	0.0	+	+	+	+	+	+
HFC-23	0.0	+	+	+	+	+	+
SF ₆	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NF ₃	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total PV	0.0	+	+	+	+	+	+
N₂O (Semiconductors)	+	0.1	0.2	0.2	0.2	0.3	0.3
N ₂ O (MEMS)	0.0	+	+	+	+	+	+
N ₂ O (PV)	0.0	+	+	+	+	+	+
Total N₂O	+	0.1	0.2	0.2	0.2	0.3	0.3
HFC, PFC and SF ₆ F-HTFs	0.0	+	+	+	+	+	+
Total Electronics Industry	3.3	4.5	4.6	4.7	4.3	4.4	4.8

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Table 4-110: PFC, HFC, SF₆, NF₃, and N₂O Emissions from Semiconductor Manufacture (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
CF ₄	114.8	145.3	219.8	234.7	219.1	224.8	236.7
C_2F_6	160.0	163.4	97.7	92.9	79.1	70.4	75.8
C ₃ F ₈	0.4	7.3	11.7	12.1	10.1	9.0	10.6
C_4F_8	0.0	10.9	5.8	6.0	5.7	5.7	6.3
HFC-23	14.6	14.1	25.7	26.5	25.5	26.6	30.3
SF ₆	21.7	33.4	30.1	33.2	32.3	31.9	38.4
NF ₃	2.8	26.2	32.8	34.0	33.1	36.0	39.5
C_4F_6	0.7	0.9	0.9	0.8	0.9	0.8	1.0
C ₅ F ₈	0.5	0.6	0.8	0.5	1.2	0.4	0.4
CH_2F_2	0.6	0.8	1.1	0.9	1.0	1.1	1.0
CH₃F	1.4	1.8	2.3	2.4	2.5	2.8	2.9
CH ₂ FCF ₃	+	+	+	+	+	+	+
N_2O	135.9	463.3	912.9	853.8	781.6	993.9	1,062.1

⁺ Does not exceed 0.05 MT.

Table 4-111: F-HTF Emissions from Electronics Manufacture by Compound Group (kt CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
HFCs	0.0	1.0	3.6	2.7	1.1	0.9	1.1
PFCs	0.0	3.8	9.1	10.0	8.4	7.8	5.4
SF ₆	0.0	5.4	16.7	13.2	6.0	12.8	9.0
HFEs	0.0	41.2	2.9	4.6	1.3	5.3	3.8
PFPMIEs	0.0	109.8	148.5	183.0	171.7	150.2	148.3
Perfluoalkylromorpholines	0.0	65.9	52.3	58.6	56.5	61.0	53.5
Perfluorotrialkylamines	0.0	208.6	384.1	410.7	363.6	380.4	359.8
Total F-HTFs	0.0	435.8	617.2	682.8	608.6	618.3	580.9

Note: Emissions of F-HTFs that are not HFCs, PFCs or SF_6 are not included in inventory totals and are included for informational purposes only. Emissions presented for informational purposes include HFEs, PFPMIEs, perfluoroalkylmorpholines, and perfluorotrialkylamines.

Methodology and Time-Series Consistency

Emissions are based on data reported through Subpart I, Electronics Manufacture, of EPA's GHGRP, semiconductor manufacturing Partner-reported emissions data received through EPA's PFC PR Reduction/Climate Partnership, EPA's PFC Emissions Vintage Model (PEVM)—a model that estimates industry emissions from etching and chamber cleaning processes in the absence of emission control strategies (Burton and Beizaie 2001) —and estimates of industry activity (i.e., total manufactured layer area and manufacturing capacity). The availability and applicability of reported emissions data from the EPA Partnership and EPA's GHGRP and activity data differ across the 1990 through 2021 time series. Consequently, fluorinated greenhouse gas (F-GHG) emissions from etching and chamber cleaning processes for semiconductors were estimated using seven distinct methods, one each for the periods 1990 through 1994, 1995 through 1999, 2000 through 2006, 2007 through 2010, 2011 and 2012, 2013 and 2014, and 2015 through 2021. Nitrous oxide emissions were estimated using five distinct methods, one each for the period 1990 through 1994, 1995 through 2010, 2011 and 2012, 2013 and 2014, and 2015 through 2021. The methodology discussion below for these time periods focuses on semiconductor emissions from etching, chamber cleaning, and uses of N₂O. Other emissions for MEMS, photovoltaic cells, and HTFs were estimated using the approaches described immediately below.

MEMS

GHGRP-reported emissions (F-GHG and N_2O) from the manufacturing of MEMS are available for the years 2011 to 2021. Emissions from manufacturing of MEMS for years prior to 2011 were calculated by linearly interpolating emissions between 1990 (at zero MMT CO_2 Eq.) and 2011, the first year where emissions from manufacturing of MEMS was reported to the GHGRP. Based upon information in the World Fab Forecast (WFF), it appears that some GHGRP reporters that manufacture both semiconductors and MEMS are reporting their emissions as only from semiconductor manufacturing; however, emissions from MEMS manufacturing are likely being included in semiconductor totals. Emissions were not estimated for non-reporters.

Photovoltaic Cells

GHGRP-reported emissions (F-GHG and N₂O) from the manufacturing of photovoltaic cells are available for 2011, 2012, 2015, and 2016 from two manufacturers. EPA estimates the emissions from manufacturing of PVs from nonreporting facilities by multiplying the estimated capacity of non-reporters by a calculated F-GHG emission factor and N2O emission factor based on GHGRP reported emissions from the manufacturer (in MMT CO2 Eq. per megawatt) that reported emissions in 2015 and 2016. This manufacture's emissions are expected to be more representative of emissions from the sector, as their emissions were consistent with consuming only CF₄ for etching processes and are a large-scale manufacturer, representing 28 percent of the U.S. production capacity in 2016. The second photovoltaic manufacturer only produced a small fraction of U.S. production (<4 percent). They also reported the use of NF₃ in remote plasma cleaning processes, which does not have an emission factor in Part 98 for PV manufacturing, requiring them to report emissions equal to consumption. The total F-GHG emissions from non-reporters are then disaggregated into individual gases using the gas distribution from the 2015 to 2016 manufacturer. Manufacturing capacities in megawatts were drawn from DisplaySearch, a 2015 Congressional Research Service Report on U.S. Solar Photovoltaic Manufacturing, and self-reported capacity by GHGRP reporters. EPA estimated that during the 2015 to 2016 period, 28 percent of manufacturing capacity in the United States was represented through reported GHGRP emissions. Capacities are estimated for the full time series by linearly scaling the total U.S. capacity between zero in 1997 to the total capacity reported of crystalline silicon (c-Si) PV

Industrial Processes and Product Uses 4-125

⁷⁸ In the context of the EPA Partnership and PEVM, PFC refers to perfluorocompounds, not perfluorocarbons.

⁷⁹ A Partner refers to a participant in the U.S. EPA PFC Reduction/Climate Partnership for the Semiconductor Industry. Through a Memorandum of Understanding (MoU) with the EPA, Partners voluntarily reported their PFC emissions to the EPA by way of a third party, which aggregated the emissions through 2010.

manufacturing in 2000 in DisplaySearch and then linearly scaling between the total capacity of c-Si PV manufacturing in DisplaySearch in 2009 to the total capacity of c-Si PV manufacturing reported in the Congressional Research Service report in 2012. Capacities were held constant for non-reporters for 2012 to 2019. In 2020, non-reporter capacity declined due to the closure of several PV manufacturing plants. This capacity was held constant for 2021. Average emissions per MW from the GHGRP reporter in 2015 and 2016 were then applied to the total capacity prior to 2015. Emissions for 2014 from the GHGRP reporter that reported in 2015 and 2016 were scaled to the number of months open in 2014. For 1998 through 2021, emissions per MW (capacity) from the GHGRP reporter were applied to the non-reporters. For 2017 through 2021, there are no reported PV emissions. Therefore, emissions were estimated using the EPA-derived emission factor and estimated manufacturing capacity from non-reporters only.

HTFs

Facility emissions of F-HTFs from semiconductor manufacturing are reported to EPA under its GHGRP and are available for the years 2011 through 2021. EPA estimates the emissions of F-HTFs from non-reporting semiconductor facilities by calculating the ratio of GHGRP-reported fluorinated HTF emissions to GHGRP reported F-GHG emissions from etching and chamber cleaning processes, and then multiplying this ratio by the F-GHG emissions from etching and chamber cleaning processes estimated for non-reporting facilities. Fluorinated HTF use in semiconductor manufacturing is assumed to have begun in the early 2000s and to have gradually displaced other HTFs (e.g., de-ionized water and glycol) in semiconductor manufacturing (EPA 2006). For time-series consistency, EPA interpolated the share of F-HTF emissions to F-GHG emissions between 2000 (at 0 percent) and 2011 (at 17 percent) and applied these shares to the unadjusted F-GHG emissions during those years to estimate the fluorinated HTF emissions.

Semiconductors

1990 through 1994

From 1990 through 1994, Partnership data were unavailable, and emissions were modeled using PEVM (Burton and Beizaie 2001). 80 The 1990 to 1994 emissions are assumed to be uncontrolled, since reduction strategies such as chemical substitution and abatement were yet to be developed.

PEVM is based on the recognition that fluorinated greenhouse gas emissions from semiconductor manufacturing vary with: (1) the number of layers that comprise different kinds of semiconductor devices, including both silicon wafer and metal interconnect layers, and (2) silicon consumption (i.e., the area of semiconductors produced) for each kind of device. The product of these two quantities, Total Manufactured Layer Area (TMLA), constitutes the activity data for semiconductor manufacturing. PEVM also incorporates an emission factor that expresses emissions per unit of manufactured layer-area. Emissions are estimated by multiplying TMLA by this emission factor.

PEVM incorporates information on the two attributes of semiconductor devices that affect the number of layers: (1) linewidth technology (the smallest manufactured feature size), ⁸¹ and (2) product type (discrete, memory or

⁸⁰ Various versions of the PEVM exist to reflect changing industrial practices. From 1990 to 1994 emissions estimates are from PEVM v1.0, completed in September 1998. The emission factor used to estimate 1990 to 1994 emissions is an average of the 1995 and 1996 emissions factors, which were derived from Partner reported data for those years.

⁸¹ By decreasing features of Integrated Circuit components, more components can be manufactured per device, which increases its functionality. However, as those individual components shrink it requires more layers to interconnect them to achieve the functionality. For example, a microprocessor manufactured with 65 nm feature sizes might contain as many as 1 billion transistors and require as many as 11 layers of component interconnects to achieve functionality, while a device

logic). 82 For each linewidth technology, a weighted average number of layers is estimated using VLSI productspecific worldwide silicon demand data in conjunction with complexity factors (i.e., the number of layers per Integrated Circuit (IC) specific to product type (Burton and Beizaie 2001; ITRS 2007). PEVM derives historical consumption of silicon (i.e., square inches) by linewidth technology from published data on annual wafer starts and average wafer size (VLSI Research, Inc. 2012).

The emission factor in PEVM is the average of four historical emission factors, each derived by dividing the total annual emissions reported by the Partners for each of the four years between 1996 and 1999 by the total TMLA estimated for the Partners in each of those years. Over this period, the emission factors varied relatively little (i.e., the relative standard deviation for the average was 5 percent). Since Partners are believed not to have applied significant emission reduction measures before 2000, the resulting average emission factor reflects uncontrolled emissions and hence may be use here to estimate 1990 through 1994 emissions. The emission factor is used to estimate U.S. uncontrolled emissions using publicly available data on world (including U.S.) silicon consumption.

As it was assumed for this time period that there was no consequential adoption of fluorinated-gas-reducing measures, a fixed distribution of fluorinated-gas use was assumed to apply to the entire U.S. industry to estimate gas-specific emissions. This distribution was based upon the average fluorinated-gas purchases made by semiconductor manufacturers during this period and the application of IPCC default emission factors for each gas (Burton and Beizaie 2001).

PEVM only addressed the seven main F-GHGs (CF₄, C₂F₆, C₃F₈, c-C₄F₈, HFC-23, SF₆, and NF₃) used in semiconductor manufacturing. Through reporting under Subpart I of EPA's GHGRP, data on other F-GHGs (C₄F6, C₅F8, HFC-32, HFC-41, HFC-134a) used in semiconductor manufacturing became available and EPA was therefore able to extrapolate this data across the entire 1990 to 2021 timeseries. To estimate emissions for these "other F-GHGs", emissions data from Subpart I between 2014 to 2016 were used to estimate the average share or percentage contribution of these gases as compared to total F-GHG emissions. Subpart I emission factors were updated for 2014 by EPA as a result of a larger set of emission factor data becoming available, so reported data from 2011 through 2013 was not utilized for the average. To estimate non-reporter emissions from 2011-2021, the average emissions data from Subpart I of 2011 to 2021 was used.

To estimate N₂O emissions, it was assumed the proportion of N₂O emissions estimated for 1995 (discussed below) remained constant for the period of 1990 through 1994.

1995 through 1999

For 1995 through 1999, total U.S. emissions were extrapolated from the total annual emissions reported by the Partners (1995 through 1999). Partner-reported emissions are considered more representative (e.g., in terms of capacity utilization in a given year) than PEVM-estimated emissions and are used to generate total U.S. emissions when applicable. The emissions reported by the Partners were divided by the ratio of the total capacity of the plants operated by the Partners and the total capacity of all of the semiconductor plants in the United States; this ratio represents the share of capacity attributable to the Partnership. This method assumes that Partners and non-Partners have identical capacity utilizations and distributions of manufacturing technologies. Plant capacity data is contained in the World Fab Forecast (WFF) database and its predecessors, which is updated quarterly. Gas-specific emissions were estimated using the same method as for 1990 through 1994.

manufactured with 130 nm feature size might contain a few hundred million transistors and require 8 layers of component interconnects (ITRS 2007).

Industrial Processes and Product Uses 4-127

⁸² Memory devices manufactured with the same feature sizes as microprocessors (a logic device) require approximately onehalf the number of interconnect layers, whereas discrete devices require only a silicon base layer and no interconnect layers (ITRS 2007). Since discrete devices did not start using PFCs appreciably until 2004, they are only accounted for in the PEVM emissions estimates from 2004 onwards.

For this time period emissions of other F-GHGs (C_4F_6 , C_5F_8 , HFC-32, HFC-41, HFC-134a) were estimated using the method described above for 1990 to 1994.

For this time period, the N_2O emissions were estimated using an emission factor that was applied to the annual, total U.S. TMLA manufactured. The emission factor was developed using a regression-through-the-origin (RTO) model: GHGRP reported N_2O emissions were regressed against the corresponding TMLA of facilities that reported no use of abatement systems. Details on EPA's GHGRP reported emissions and development of emission factor using the RTO model are presented in the 2011 through 2012 section. The total U.S. TMLA for 1995 through 1999 was estimated using PEVM.

2000 through 2006

Emissions for the years 2000 through 2006—the period during which Partners began the consequential application of fluorinated greenhouse gas-reduction measures—were estimated using a combination of Partner-reported emissions and adjusted PEVM modeled emissions. The emissions reported by Partners for each year were accepted as the quantity emitted from the share of the industry represented by those Partners. Remaining emissions, those from non-Partners, were estimated using PEVM, with one change. To ensure time-series consistency and to reflect the increasing use of remote clean technology (which increases the efficiency of the production process while lowering emissions of fluorinated greenhouse gases), the average non-Partner emission factor (PEVM emission factor) was assumed to begin declining gradually during this period. Specifically, the non-Partner emission factor for each year was determined by linear interpolation, using the end points of 1999 (the original PEVM emission factor) and 2011 (a new emission factor determined for the non-Partner population based on GHGRP-reported data, described below).

The portion of the U.S. total emissions attributed to non-Partners is obtained by multiplying PEVM's total U.S. emissions figure by the non-Partner share of U.S. total silicon capacity for each year as described above. ⁸³ Gasspecific emissions from non-Partners were estimated using linear interpolation between the gas-specific emissions distributions of 1999 (assumed to be the same as that of the total U.S. Industry in 1994) and 2011 (calculated from a subset of non-Partners that reported through the GHGRP as a result of emitting more than 25,000 MT CO₂ Eq. per year). Annual updates to PEVM reflect published figures for actual silicon consumption from VLSI Research, Inc., revisions and additions to the world population of semiconductor manufacturing plants, and changes in IC fabrication practices within the semiconductor industry (see ITRS 2008 and Semiconductor Equipment and

4-128 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

⁸³ This approach assumes that the distribution of linewidth technologies is the same between Partners and non-Partners. As discussed in the description of the method used to estimate 2007 emissions, this is not always the case.

Materials Industry 2011).^{84, 85, 86} For this time period emissions of other F-GHGs (C₄F₆, C₅F₈, HFC-32, HFC-41, HFC-134a) were estimated using the method described above for 1990 to 1994.

Nitrous oxide emissions were estimated using the same methodology as the 1995 through 1999 methodology.

2007 through 2010

For the years 2007 through 2010, emissions were also estimated using a combination of Partner reported emissions and adjusted PEVM modeled emissions to provide estimates for non-Partners; however, two improvements were made to the estimation method employed for the previous years in the time series. First, the 2007 through 2010 emission estimates account for the fact that Partners and non-Partners employ different distributions of manufacturing technologies, with the Partners using manufacturing technologies with greater transistor densities and therefore greater numbers of layers. ⁸⁷ Second, the scope of the 2007 through 2010 estimates was expanded relative to the estimates for the years 2000 through 2006 to include emissions from research and development (R&D) fabs. This additional enhancement was feasible through the use of more detailed data published in the WFF. PEVM databases were updated annually as described above. The published world average capacity utilization for 2007 through 2010 was used for production fabs, while for R&D fabs a 20 percent figure was assumed (SIA 2009).

In addition, publicly available utilization data was used to account for differences in fab utilization for manufacturers of discrete and IC products for 2010 emissions for non-Partners. The Semiconductor Capacity Utilization (SICAS) Reports from SIA provides the global semiconductor industry capacity and utilization, differentiated by discrete and IC products (SIA 2009 through 2011). PEVM estimates were adjusted using technology-weighted capacity shares that reflect the relative influence of different utilization. Gas-specific emissions for non-Partners were estimated using the same method as for 2000 through 2006.

 84 Special attention was given to the manufacturing capacity of plants that use wafers with 300 mm diameters because the actual capacity of these plants is ramped up to design capacity, typically over a 2 to 3 year period. To prevent overstating estimates of partner-capacity shares from plants using 300 mm wafers, design capacities contained in WFF were replaced with estimates of actual installed capacities for 2004 published by Citigroup Smith Barney (2005). Without this correction, the partner share of capacity would be overstated, by approximately 5 percent. For perspective, approximately 95 percent of all new capacity additions in 2004 used 300 mm wafers, and by year-end those plants, on average, could operate at approximately 70 percent of the design capacity. For 2005, actual installed capacities were estimated using an entry in the World Fab Watch database (April 2006 Edition) called "wafers/month, 8-inch equivalent," which denoted the actual installed capacity instead of the fully-ramped capacity. For 2006, actual installed capacities of new fabs were estimated using an average monthly ramp rate of 1100 wafer starts per month (wspm) derived from various sources such as semiconductor fabtech, industry analysts, and articles in the trade press. The monthly ramp rate was applied from the first-quarter of silicon volume (FQSV) to determine the average design capacity over the 2006 period.

⁸⁵ In 2006, the industry trend in co-ownership of manufacturing facilities continued. Several manufacturers, who are Partners, now operate fabs with other manufacturers, who in some cases are also Partners and in other cases are not Partners. Special attention was given to this occurrence when estimating the Partner and non-Partner shares of U.S. manufacturing capacity.

⁸⁶ Two versions of PEVM are used to model non-Partner emissions during this period. For the years 2000 to 2003 PEVM v3.2.0506.0507 was used to estimate non-Partner emissions. During this time, discrete devices did not use PFCs during manufacturing and therefore only memory and logic devices were modeled in the PEVM v3.2.0506.0507. From 2004 onwards, discrete device fabrication started to use PFCs, hence PEVM v4.0.0701.0701, the first version of PEVM to account for PFC emissions from discrete devices, was used to estimate non-Partner emissions for this time period.

⁸⁷ EPA considered applying this change to years before 2007 but found that it would be difficult due to the large amount of data (i.e., technology-specific global and non-Partner TMLA) that would have to be examined and manipulated for each year. This effort did not appear to be justified given the relatively small impact of the improvement on the total estimate for 2007 and the fact that the impact of the improvement would likely be lower for earlier years because the estimated share of emissions accounted for by non-Partners is growing as Partners continue to implement emission-reduction efforts.

For this time period emissions of other F-GHGs (C_5F_8 , CH_2F_2 , CH_3F , CH_2FCF_3 , $C_2H_2F_4$) were estimated using the method described above for 1990 to 1994.

Nitrous oxide emissions were estimated using the same methodology as the 1995 through 1999 methodology.

2011 through 2012

The fifth method for estimating emissions from semiconductor manufacturing covers the period 2011 through 2012. This methodology differs from previous years because the EPA's Partnership with the semiconductor industry ended (in 2010) and reporting under EPA's GHGRP began. Manufacturers whose estimated uncontrolled emissions equal or exceed 25,000 MT CO₂ Eq. per year (based on default F-GHG-specific emission factors and total capacity in terms of substrate area) are required to report their emissions to EPA. This population of reporters to EPA's GHGRP included both historical Partners of EPA's PFC Reduction/Climate Partnership as well as non-Partners some of which use gallium arsenide (GaAs) technology in addition to Si technology. ⁸⁸ Emissions from the population of manufacturers that were below the reporting threshold were also estimated for this time period using EPA-developed emission factors and estimates of facility-specific production obtained from WFF. Inventory totals reflect the emissions from both reporting and non-reporting populations.

Under EPA's GHGRP, semiconductor manufacturing facilities report emissions of F-GHGs (for all types of F-GHGs) used in etch and clean processes as well as emissions of fluorinated heat transfer fluids. (Fluorinated heat transfer fluids are used to control process temperatures, thermally test devices, and clean substrate surfaces, among other applications.) They also report N_2O emissions from CVD and other processes. The F-GHGs and N_2O were aggregated, by gas, across all semiconductor manufacturing GHGRP reporters to calculate gas-specific emissions for the GHGRP-reporting segment of the U.S. industry. At this time, emissions that result from heat transfer fluid use that are HFC, PFC and SF_6 are included in the total emission estimates from semiconductor manufacturing, and these GHGRP-reported emissions have been compiled and presented in Table 4-109. F-HTF emissions resulting from other types of gases (e.g., HFEs) are not presented in semiconductor manufacturing totals in Table 4-109 and Table 4-110 but are shown in Table 4-111 for informational purposes.

Changes to the default emission factors and default destruction or removal efficiencies (DREs) used for GHGRP reporting affected the emissions trend between 2013 and 2014. These changes did not reflect actual emission rate changes but data improvements. Therefore, for the current Inventory, EPA adjusted the time series of GHGRP-reported data for 2011 through 2013 to ensure time-series consistency using a series of calculations that took into account the characteristics of a facility (e.g., wafer size and abatement use). To adjust emissions for facilities that did not report abatement in 2011 through 2013, EPA simply applied the revised emission factors to each facility's estimated gas consumption by gas, process type and wafer size. In 2014, EPA also started collecting information on fab-wide DREs and the gases abated by process type, which were used in calculations for adjusting emissions from facilities that abated F-GHGs in 2011 through 2013.

To adjust emissions for facilities that abated emissions in 2011 through 2013, EPA first calculated the
quantity of gas abated in 2014 using reported F-GHG emissions, the revised default DREs (or the
estimated site-specific DRE, ⁸⁹ if a site-specific DRE was indicated), and the fab-wide DREs reported in
2014. ⁹⁰ To adjust emissions for facilities that abated emissions in 2011 through 2013, EPA first estimated

4-130 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁸⁸ GaAs and Si technologies refer to the wafer on which devices are manufactured, which use the same PFCs but in different ways.

⁸⁹ EPA generally assumed site-specific DREs were as follows: CF₄, Etch (90 percent); all other gases, Etch (98 percent); NF₃, Clean (95 percent); CF₄, Clean (80 percent), and all other gases, Clean (80 percent). There were a few exceptions where a higher DRE was assumed to ensure the calculations operated correctly when there was 100 percent abatement.

 $^{^{90}}$ If abatement information was not available for 2014 or the reported incorrectly in 2014, data from 2015 or 2016 was substituted.

the percentage of gas passing through abatement systems for remote plasma clean in 2014 using the ratio of emissions reported for CF₄ and NF₃.

- EPA then estimated the quantity of NF₃ abated for remote plasma clean in 2014 using the ratio of emissions reported for CF₄ (which is not abated) and NF₃. This abated quantity was then subtracted from the total abated quantity calculated as described in the bullet above.
- To account for the resulting remaining abated quantity, EPA assumed that the percentage of gas passing through abatement systems was the same across all remaining gas and process type combinations where abatement was reported for 2014.
- The percentage of gas abated was then assumed to be the same in 2011 through 2013 (if the facility claimed abatement that year) as in 2014 for each gas abated in 2014.

The revised emission factors and DREs were then applied to the estimated gas consumption for each facility by gas, process type and wafer size. 91

For the segment of the semiconductor industry that is below EPA's GHGRP reporting threshold, and for R&D facilities, which are not covered by EPA's GHGRP, emission estimates are based on EPA-developed emission factors for the F-GHGs and N₂O and estimates of manufacturing activity. The new emission factors (in units of mass of CO₂ Eq./TMLA [million square inches (MSI)]) are based on the emissions reported under EPA's GHGRP by facilities without abatement and on the TMLA estimates for these facilities based on the WFF (SEMI 2012, 2013). 92 In a refinement of the method used to estimate emissions for the non-Partner population for prior years, different emission factors were developed for different subpopulations of fabs, disaggregated by wafer size (200 mm and 300 mm). For each of these groups, a subpopulation-specific emission factor was obtained using a regressionthrough-the-origin (RTO) model: facility-reported aggregate emissions of seven F-GHGs (CF4, C₂F6, C₃F8, c-C₄F8, CHF₃, SF₆ and NF₃)⁹³ were regressed against the corresponding TMLA to estimate an aggregate F-GHG emissions factor (CO₂ Eq./MSI TMLA), and facility-reported N₂O emissions were regressed against the corresponding TMLA to estimate a N₂O emissions factor (CO₂ Eq./MSI TMLA). For each subpopulation, the slope of the RTO model is the emission factor for that subpopulation. Information on the use of point-of-use abatement by non-reporting fabs was not available; thus, EPA conservatively assumed that non-reporting facilities did not use point-of-use abatement.

For 2011 and 2012, estimates of TMLA relied on the capacity utilization of the fabs published by the U.S. Census Bureau's Historical Data Quarterly Survey of Plant Capacity Utilization (USCB 2011, 2012). Similar to the assumption for 2007 through 2010, facilities with only R&D activities were assumed to utilize only 20 percent of their manufacturing capacity. All other facilities in the United States are assumed to utilize the average percent of the manufacturing capacity without distinguishing whether fabs produce discrete products or logic products.

Non-reporting fabs were then broken out into subpopulations by wafer size (200 mm and 300 mm). using information available through the WFF. The appropriate emission factor was applied to the total TMLA of each subpopulation of non-reporting facilities to estimate the CO₂-equivalent emissions of that subpopulation.

⁹¹ Since facilities did not report by fab before 2014, fab-wide DREs were averaged if a facility had more than one fab. For facilities that reported more than one wafer size per facility, the percentages of a facility's emissions per wafer size were estimated in 2014 and applied to earlier years, if possible. If the percentage of emissions per wafer size were unknown, a 50/50

⁹² EPA does not have information on fab-wide DREs for this time period, so it is not possible to estimate uncontrolled emissions from fabs that reported point-of-use abatement. These fabs were therefore excluded from the regression analysis. (They are still included in the national totals.)

 $^{^{93}}$ Only seven gases were aggregated because inclusion of F-GHGs that are not reported in the Inventory results in overestimation of emission factor that is applied to the various non-reporting subpopulations.

Gas-specific, CO₂-equivalent emissions for each subpopulation of non-reporting facilities were estimated using the corresponding reported distribution of gas-specific, CO₂-equivalent emissions from which the aggregate emission factors, based on GHGRP-reported data, were developed. Estimated in this manner, the non-reporting population accounted for 4.9 and 5.0 percent of U.S. emissions in 2011 and 2012, respectively. The GHGRP-reported emissions and the calculated non-reporting population emissions are summed to estimate the total emissions from semiconductor manufacturing.

2013 and 2014

For 2013 and 2014, as for 2011 and 2012, F-GHG and N₂O emissions data received through EPA's GHGRP were aggregated, by gas, across all semiconductor-manufacturing GHGRP reporters to calculate gas-specific emissions for the GHGRP-reporting segment of the U.S. industry. However, for these years WFF data was not available. Therefore, an updated methodology that does not depend on the WFF derived activity data was used to estimate emissions for the segment of the industry that are not covered by EPA's GHGRP. For the facilities that did not report to the GHGRP (i.e., which are below EPA's GHGRP reporting threshold or are R&D facilities), emissions were estimated based on the proportion of total U.S. emissions attributed to non-reporters for 2011 and 2012. EPA used a simple averaging method by first estimating this proportion for both F-GHGs and N₂O for 2011, 2012, and 2015 and 2016, resulting in one set of proportions for F-GHGs and one set for N₂O, and then applied the average of each set to the 2013 and 2014 GHGRP reported emissions to estimate the non-reporters' emissions. Fluorinated gas-specific, CO₂-equivalent emissions for non-reporters were estimated using the corresponding reported distribution of gas-specific, CO₂-equivalent emissions reported through EPA's GHGRP for 2013 and 2014.

GHGRP-reported emissions in 2013 were adjusted to capture changes to the default emission factors and default destruction or removal efficiencies used for GHGRP reporting, affecting the emissions trend between 2013 and 2014. EPA used the same method to make these adjustments as described above for 2011 and 2012 GHGRP data.

2015 through 2021

Similar to the methods described above for 2011 and 2012, and 2013 and 2014, EPA relied upon emissions data reported directly through the GHGRP. For 2015 through 2021, EPA took an approach similar to the one used for 2011 and 2012 to estimate emissions for the segment of the semiconductor industry that is below EPA's GHGRP reporting threshold, and for R&D facilities, which are not covered by EPA's GHGRP. However, in a change from previous years, EPA was able to develop new annual emission factors for 2015 through 2021 using TMLA from WFF and a more comprehensive set of emissions, i.e., fabs with as well as without abatement control, as new information about the use of abatement in GHGRP fabs and fab-wide were available. Fab-wide DREs represent total fab CO₂ Eq.-weighted controlled F-GHG and N₂O emissions (emissions after the use of abatement) divided by total fab CO₂ Eq.-weighted uncontrolled F-GHG and N₂O emissions (emission prior to the use of abatement).

Using information about reported emissions and the use of abatement and fab-wide DREs, EPA was able to calculate uncontrolled emissions (each total F-GHG and N_2O) for every GHGRP reporting fab. Using this, coupled with TMLA estimated using methods described above (see 2011 through 2012), EPA derived emission factors by year, gas type (F-GHG or N_2O), and wafer size (200 mm and less or 300 mm) by dividing the total annual emissions reported by GHGRP reporters by the total TMLA estimated for those reporters. These emission factors were multiplied by estimates of non-reporter TMLA to arrive at estimates of total F-GHG and N_2O emissions for non-reporters for each year. For each wafer size, the total F-GHG emissions were disaggregated into individual gases using the shares of total emissions represented by those gases in the emissions reported to the GHGRP by unabated fabs producing that wafer size.

Data Sources

GHGRP reporters, which consist of former EPA Partners and non-Partners, estimated their emissions using a default emission factor method established by EPA. Like the Tier 2c Method in the 2019 Refinement to the 2006 IPCC Guidelines, this method uses different emission and byproduct generation factors for different F-GHGs and process types and uses factors for different wafer sizes (i.e., 300mm vs. 150 and 200mm) and CVD clean subtypes

(in situ thermal, in situ plasma, and remote plasma). Starting with 2014 reported emissions, EPA's GHGRP required semiconductor manufacturers to apply updated emission factors to estimate their F-GHG emissions. For the years 2011 through 2013 reported emissions, semiconductor manufacturers used older emission factors to estimate their F-GHG emissions (Federal Register / Vol. 75, No. 230 / December 1, 2010, 74829). Subpart I emission factors were updated for 2014 by EPA as a result of a larger set of emission factor data becoming available as part of the Subpart I petition process, which took place from 2011 through 2013. In addition to semiconductor manufacturing, GHGRP also includes reported emissions from MEMS and PV producers.

Historically, semiconductor industry partners estimated and reported their emissions using a range of methods and uneven documentation. It is assumed that most Partners used a method at least as accurate as the IPCC's Tier 2a Methodology, recommended in the 2006 IPCC Guidelines. Partners are estimated to have accounted for between 56 and 79 percent of F-GHG emissions from U.S. semiconductor manufacturing between 1995 and 2010, with the percentage declining in recent years as Partners increasingly implemented abatement measures.

Estimates of operating plant capacities and characteristics for Partners and non-Partners were derived from the Semiconductor Equipment and Materials Industry (SEMI) WFF (formerly World Fab Watch) database (1996 through 2012, 2013, 2016, 2018, and 2021) (e.g., Semiconductor Materials and Equipment Industry 2021). Actual worldwide capacity utilizations for 2008 through 2010 were obtained from Semiconductor International Capacity Statistics (SICAS) (SIA 2009 through 2011). Estimates of the number of layers for each linewidth was obtained from International Technology Roadmap for Semiconductors: 2013 Edition (Burton and Beizaie 2001; ITRS 2007; ITRS 2008; ITRS 2011; ITRS 2013). PEVM utilized the WFF, SICAS, and ITRS, as well as historical silicon consumption estimates published by VLSI. Actual quarterly U.S. capacity utilizations for 2011, 2012, 2014 to 2021 were obtained from the U.S. Census Bureau's Historical Data Quarterly Survey of Plant Capacity Utilization (USCB 2011, 2012, 2015, 2016, 2017, 2018, 2019, 2020, 2021).

Estimates of PV manufacturing capacity, which are used to calculate emissions from non-reporting facilities, are based on data from two sources. A historical market analysis from DisplaySearch provided estimates of U.S. manufacturing capacity from 2000-2009 (DisplaySearch 2010). Domestic PV cell production for 2012 was obtained from a Congressional Research Service report titled U.S. Solar Photovoltaic Manufacturing: Industry Trends, Global Competition, Federal Support (Platzer 2015).

Uncertainty

A quantitative uncertainty analysis of this source category was performed using the IPCC-recommended Approach 2 uncertainty estimation methodology, the Monte Carlo Stochastic Simulation technique. The Monte Carlo Stochastic Simulation was performed on the total emissions estimate from the Electronics Industry, represented in equation form as:

Equation 4-19: Total Emissions from Electronics Industry

```
Total Emissions (E_T)
                 = Semiconductors F – GHG and N_20 Emissions (E_{Semi}) + MEMS F
                 - GHG and N_20 Emissions (E<sub>MEMS</sub>) + PV F - GHG and N_20 Emissions (E<sub>PV</sub>)
                 + HFC, PFC and SF6 F - HTFs Emissions (E_{HTF})
```

The uncertainty in the total emissions for the Electronics Industry, presented in Table 4-112 below, results from the convolution of four distributions of emissions, namely from semiconductors manufacturing, MEMS manufacturing, PV Manufacturing and emissions of Heat Transfer Fluids. The approaches for estimating uncertainty in each of the sources are described below:

Semiconductors Manufacture Emission Uncertainty

The Monte Carlo Stochastic Simulation was performed on the emissions estimate from semiconductor manufacturing, represented in equation form as:

Equation 4-20: Total Emissions from Semiconductor Manufacturing

```
\begin{split} \text{Semiconductors F} &- \text{GHG and } N_2 \text{O Emissions } (\text{E}_{Semi}) \\ &= \text{GHGRP Reported F} - \text{GHG Emissions } (\text{ER, F} - \text{GHG, Semi}) + \text{Non} \\ &- \text{Reporters' Estimated F} - \text{GHG Emissions } (\text{E}_{\text{NR,F}-\text{GHG,Semi}}) + \text{GHGRP Reported } N_2 \text{O Emissions } (\text{E}_{\text{R,N}_2\text{O,Semi}}) + \text{Non} \\ &- \text{Reporters' Estimated } N_2 \text{O Emissions } (\text{E}_{\text{NR,N}_2\text{O,Semi}}) \end{split}
```

The uncertainty in E_{Semi} results from the convolution of four distributions of emissions, $E_{R,F-GHG,Semi}$ $E_{R,N2O,Semi}$ $E_{NR,F-GHG,Semi}$ and $E_{NR,N2O,Semi}$. The approaches for estimating each distribution and combining them to arrive at the reported 95 percent confidence interval (CI) for E_{Semi} are described in the remainder of this section.

The uncertainty estimate of E_{R, F-GHG}, semi, or GHGRP-reported F-GHG emissions, is developed based on gas-specific uncertainty estimates of emissions for two industry segments, one processing 200 mm or less wafers and one processing 300 mm wafers. Uncertainties in emissions for each gas and industry segment are based on an uncertainty analysis conducted during the assessment of emission estimation methods for the Subpart I rulemaking in 2012 (see Technical Support for Modifications to the Fluorinated Greenhouse Gas Emission Estimation Method Option for Semiconductor Facilities under Subpart I, docket EPA–HQ–OAR–2011–0028). ⁹⁴ This assessment relied on facility-specific gas information by gas and wafer size, and incorporated uncertainty associated with both emission factors and gas consumption quantities. The 2012 analysis did not consider the use of abatement.

For the industry segment that manufactured 200 mm wafers, estimates of uncertainty at a 95 percent CI ranged from ± 29 percent for C_3F_8 to ± 10 percent for CF_4 . For the corresponding 300 mm industry segment, estimates of uncertainty at the 95 percent CI ranged from ± 36 percent for C_4F_8 to ± 16 percent for CF_4 . For gases for which uncertainty was not analyzed in the 2012 assessment (e.g., CH_2F_2), EPA applied the 95 percent CI range equivalent to the range for the gas and industry segment with the highest uncertainty from the 2012 assessment. These gas and wafer-specific uncertainty estimates were developed to represent uncertainty at a facility-level, but they are applied to the total emissions across all the facilities that did not abate emissions as reported under EPA's GHGRP at a national-level. Hence, it is noted that the uncertainty estimates used may be overestimating the uncertainties at a national-level.

For those facilities reporting abatement of emissions under EPA's GHGRP, estimates of uncertainties for the no abatement industry segments are modified to reflect the use of full abatement (abatement of all gases from all cleaning and etching equipment) and partial abatement. These assumptions used to develop uncertainties for the partial and full abatement facilities are identical for 200 mm and 300 mm wafer processing facilities. For all facilities reporting gas abatement, a triangular distribution of destruction or removal efficiency is assumed for each gas. The triangular distributions range from an asymmetric and highly uncertain distribution of zero percent minimum to 90 percent maximum with 70 percent most likely value for CF₄ to a symmetric and less uncertain distribution of 85 percent minimum to 95 percent maximum with 90 percent most likely value for C₄F₈, NF₃, and

4-134 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

⁹⁴ On November 13, 2013, EPA published a final rule revising Subpart I (Electronics Manufacturing) of the GHGRP (78 FR 68162). The revised rule includes updated default emission factors and updated default destruction and removal efficiencies that are slightly different from those that semiconductor manufacturers were required to use to report their 2012 emissions. The uncertainty analyses that were performed during the development of the revised rule focused on these updated defaults but are expected to be reasonably representative of the uncertainties associated with the older defaults, particularly for estimates at the country level. (They may somewhat underestimate the uncertainties associated with the older defaults at the facility level.) For simplicity, the 2012 estimates are assumed to be unbiased although in some cases, the updated (and therefore more representative) defaults are higher or lower than the older defaults. Multiple models and sensitivity scenarios were run for the Subpart I analysis. The uncertainty analysis presented here made use of the Input gas and wafer size model (Model 1) under the following conditions: Year = 2010, f = 20, n = SIA3.

SF₆. For facilities reporting partial abatement, the distribution of fraction of the gas fed through the abatement device, for each gas, is assumed to be triangularly distributed as well. It is assumed that no more than 50 percent of the gases are abated (i.e., the maximum value) and that 50 percent is the most likely value, and the minimum is zero percent. Consideration of abatement then resulted in four additional industry segments, two 200-mm wafer-processing segments (one fully and one partially abating each gas) and two 300-mm wafer-processing segment (one fully and the other partially abating each gas). Gas-specific emission uncertainties were estimated by convolving the distributions of unabated emissions with the appropriate distribution of abatement efficiency for fully and partially abated facilities using a Monte Carlo simulation.

The uncertainty in E_{R,F-GHG,Semi} is obtained by allocating the estimates of uncertainties to the total GHGRP-reported emissions from each of the six industry segments, and then running a Monte Carlo simulation which results in the 95 percent CI for emissions from GHGRP-reporting facilities (E_{R,F-GHG,Semi}).

The uncertainty in $E_{R,N2O,Semi}$ is obtained by assuming that the uncertainty in the emissions reported by each of the GHGRP reporting facilities results from the uncertainty in quantity of N_2O consumed and the N_2O emission factor (or utilization). Similar to analyses completed for Subpart I (see Technical Support for Modifications to the Fluorinated Greenhouse Gas Emission Estimation Method Option for Semiconductor Facilities under Subpart I, docket EPA—HQ—OAR—2011—0028), the uncertainty of N_2O consumed was assumed to be 20 percent. Consumption of N_2O for GHGRP reporting facilities was estimated by back-calculating from emissions reported and assuming no abatement. The quantity of N_2O utilized (the complement of the emission factor) was assumed to have a triangular distribution with a minimum value of zero percent, mode of 20 percent and maximum value of 84 percent. The minimum was selected based on physical limitations, the mode was set equivalent to the Subpart I default N_2O utilization rate for chemical vapor deposition, and the maximum was set equal to the maximum utilization rate found in ISMI Analysis of Nitrous Oxide Survey Data (ISMI 2009). The inputs were used to simulate emissions for each of the GHGRP reporting, N_2O -emitting facilities. The uncertainty for the total reported N_2O emissions was then estimated by combining the uncertainties of each facilities' reported emissions using Monte Carlo simulation.

The estimate of uncertainty in E_{NR, F-GHG,Semi} and E_{NR, N2O,Semi} entailed developing estimates of uncertainties for the emissions factors and the corresponding estimates of TMLA.

The uncertainty in TMLA depends on the uncertainty of two variables—an estimate of the uncertainty in the average annual capacity utilization for each level of production of fabs (e.g., full scale or R&D production) and a corresponding estimate of the uncertainty in the number of layers manufactured. For both variables, the distributions of capacity utilizations and number of manufactured layers are assumed triangular for all categories of non-reporting fabs. The most probable utilization is assumed to be 82 percent, with the highest and lowest utilization assumed to be 89 percent, and 70 percent, respectively. For the triangular distributions that govern the number of possible layers manufactured, it is assumed the most probable value is one layer less than reported in the ITRS; the smallest number varied by technology generation between one and two layers less than given in the ITRS and largest number of layers corresponded to the figure given in the ITRS.

The uncertainty bounds for the average capacity utilization and the number of layers manufactured are used as inputs in a separate Monte Carlo simulation to estimate the uncertainty around the TMLA of both individual facilities as well as the total non-reporting TMLA of each sub-population.

The uncertainty around the emission factors for non-reporting facilities is dependent on the uncertainty of the total emissions (MMT CO₂ Eq. units) and the TMLA of each reporting facility in that category. For each wafer size for reporting facilities, total emissions were regressed on TMLA (with an intercept forced to zero) for 10,000 emission and 10,000 TMLA values in a Monte Carlo simulation, which results in 10,000 total regression coefficients (emission factors). The 2.5th and the 97.5th percentile of these emission factors are determined, and the bounds are assigned as the percent difference from the estimated emission factor.

The next step in estimating the uncertainty in emissions of reporting and non-reporting facilities in semiconductor manufacture is convolving the distribution of reported emissions, emission factors, and TMLA using Monte Carlo simulation. For this Monte Carlo simulation, the distributions of the reported F-GHG gas- and wafer size-specific emissions are assumed to be normally distributed, and the uncertainty bounds are assigned at 1.96 standard

deviations around the estimated mean. The were some instances, though, where departures from normality were observed for variables, including for the distributions of the gas- and wafer size-specific N_2O emissions, TMLA, and non-reporter emission factors, both for F-GHGs and N_2O . As a result, the distributions for these parameters were assumed to follow a pert beta distribution.

MEMS Manufacture Emission Uncertainty

The Monte Carlo Stochastic Simulation was performed on the emissions estimate from MEMS manufacturing, represented in equation form as:

Equation 4-21: Total Emissions from MEMS Manufacturing

MEMS F-GHG and N₂O Emissions (E_{MEMS}) = GHGRP Reported F-GHG Emissions ($E_{\text{R,F-GHG,MEMS}}$) + GHGRP Reported N₂O Emissions ($E_{\text{R,N}_{2}\text{O},\text{MEMS}}$)

```
MEMS F – GHG and N_2O Emissions (E_{MEMS})
= GHGRP Reported F – GHG Emissions (E_{R,F-GHG,MEMS})
+ GHGRP Reported N_2O Emissions (E_{R,N_2O,MEMS})
```

Emissions from MEMS manufacturing are only quantified for GHGRP reporters. MEMS manufacturers that report to the GHGRP all report the use of 200 mm wafers. Some MEMS manufacturers report using abatement equipment. Therefore, the estimates of uncertainty at the 95 percent CI for each gas emitted by MEMS manufacturers are set equal to the gas-specific uncertainties for manufacture of 200mm semiconductor wafers with partial abatement. The same assumption is applied for uncertainty levels for GHGRP reported MEMS N₂O emissions (E_{R,N2O,MEMS}).

PV Manufacture Emission Uncertainty

The Monte Carlo Stochastic Simulation was performed on the emissions estimate from PV manufacturing, represented in equation form as:

Equation 4-22: Total Emissions from PV Manufacturing

 $PV \ F\text{-}GHG \ and \ N_2O \ Emissions \ (E_{PV}) = Non-Reporters' \ Estimated \ F\text{-}GHG \ Emissions \ (E_{NR,F\text{-}GHG,PV}) + Non-Reporters' \ Estimated \ N_2O \ Emissions \ (E_{NR,N_2O,PV})$

```
\begin{array}{c} \text{PV F} - \text{GHG and N}_2\text{O} \ \text{Emissions} \ (\text{E}_{\text{PV}}) \\ = \text{Non} - \text{Reporters' Estimated F} - \text{GHG Emissions} \left(\text{E}_{\text{NR,F-GHG,PV}}\right) + \ \text{Non} \\ - \text{Reporters' Estimated N2O Emissions} \left(\text{E}_{\text{NR,N-O,PV}}\right) \end{array}
```

Emissions from PV manufacturing are only estimated for non-GHGRP reporters. There were no reported emissions from PV manufacturing in GHGRP in 2021. The "Non-Reporters' Estimated F-GHG Emissions" term in Equation 4-22 was estimated using an emission factor developed using emissions from reported data in 2015 and 2016 and total non-reporters' capacity. Due to a lack of information and data and because they represent similar physical and chemical processes, the uncertainty at the 95 percent CI level for non-reporter PV capacity is assumed to be the same as the uncertainty in non-reporter TMLA for semiconductor manufacturing. Similarly, the uncertainty for the PV manufacture emission factors are assumed to be the same as the uncertainties in emission factors used for non-reporters in semiconductor manufacture.

Heat Transfer Fluids Emission Uncertainty

There is a lack of data related to the uncertainty of emission estimates of heat transfer fluids used for electronics manufacture. Therefore, per the *2006 IPCC Guidelines* (IPCC 2006, Volume 3, Chapter 6), uncertainty bounds of 20 percent were applied to estimate uncertainty associated with the various types of heat transfer fluids, including PFCs, HFC, and SF₆, at the national level.

The results of the Approach 2 quantitative uncertainty analysis for electronics manufacturing are summarized in Table 4-112. These results were obtained by convolving—using Monte Carlo simulation—the distributions of emissions for each reporting and non-reporting facility that manufactures semiconductors, MEMS, or PVs and use heat transfer fluids. The emissions estimate for total U.S. F-GHG, N₂O, and HTF emissions from electronics manufacturing were estimated to be between 4.88 and 5.50 MMT CO₂ Eq. at a 95 percent CI level. This range represents 6 percent below to 6 percent above the 2021 emission estimate of 5.19 MMT CO₂ Eq. for all emissions from electronics manufacture. This range and the associated percentages apply to the estimate of total emissions rather than those of individual gases. Uncertainties associated with individual gases will be somewhat higher than the aggregate but were not explicitly modeled.

Table 4-112: Approach 2 Quantitative Uncertainty Estimates for HFC, PFC, SF₆, NF₃ and N₂O Emissions from Electronics Manufacture (MMT CO₂ Eq. and Percent)

		2021 Emission Estimate Uncertainty Range Relative to Emission E				
Source	Gas	(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)	
			Lower	Upper	Lower	Upper
			Bound ^b	Bound ^b	Bound	Bound
Electronics Industry	HFC, PFC, SF ₆ , NF ₃ , and N ₂ O	4.8	4.5	5.1	-6%	6%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For its GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). 95 Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The postsubmittals checks are consistent with a number of general and category-specific QC procedures including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter and Annex 8 for more details.

Recalculations Discussion

Any resubmitted emissions data reported to EPA's GHGRP from all prior years were updated in this Inventory. Additionally, EPA made the following changes:

 To estimate non-reporter F-GHG and N₂O emissions, EPA relies on data reported through Subpart I and the World Fab Forecast. This process requires EPA to map facilities that report through Subpart I and which are also represented in the World Fab Forecast. For this Inventory update, EPA identified and made corrections to a few instances of this mapping based on new information and additional reviews of the data. This had minimal effects on emission estimates.

^b Absolute lower and upper bounds were calculated using the corresponding lower and upper bounds in percentages.

⁹⁵ GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp verification factsheet.pdf.

- EPA re-ran regression analyses for years 2010 to 2020 to reflect updates to Subpart I and the World Fab Forecast. These changes had minor effects on the emission factors, standard error, and R² values for all years. This resulted in the recalculation of non-reporter's F-GHG and N₂O estimates for all years.
- To estimate emissions for "other F-GHGs" in the years prior to 2011, emissions data from Subpart I were used to estimate the average share or percentage contribution of these gases as compared to total F-GHG emissions. Previously, the emissions data between 2011-2020 was used to calculate this average. However, the average in this Inventory was updated to only include 2014-2016. This change was made to make a more realistic estimate of the distribution of other F-GHGs pre-2011. This will also hold the pre-2011 other F-GHGs emissions constant in future inventories. Emissions data from 2011-2013 was not used as the 2011-2013 data did not reflect the updated emissions factors in Subpart I.
- To estimate emissions of HFCs, PFCs, and SF₆ from F-HTFs between 2001 and 2010, emissions data from Subpart I were used to estimate the average share or percentage contribution of these gases as compared to total F-HTFs emissions. Previously, this average was calculated using Subpart I data from 2011 to 2021. However, to estimate the distribution of these gases between 2001 and 2010 more realistically, emissions data from 2011 to 2013 was averaged instead. This will hold the pre-2011 emissions constant in future inventories.
- Previously, F-GHG emissions from a PV manufacturer not-reporting through the GHGRP were held constant from 2013 through the most recent Inventory year. EPA determined that this manufacturer ceased operations in 2019, so their reported emissions were changed to zero for 2020 and beyond.
- To improve the uncertainty analysis for this source category other F-GHGs from semiconductor manufacturing, HFC, PFC, and SF₆ emissions from the use of heat transfer fluids and emissions resulting from the manufacturing of PVs and MEMS were included in total uncertainty estimates.

Overall, the impact of these recalculations led to an average decrease of 0.004 MMT CO₂ Eq. (0.083 percent) across the time series (1990 through 2020).

For the current Inventory, estimates of CO₂-equivalent F-GHGs, N₂O, and F-HTF emissions from the electronics inventory have been revised to reflect the 100-year GWPs provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWPs of CF₄, C₂F₆, and NF₃, three of the most significant contributors to total emissions in this source category, have decreased, leading to a decrease in calculated CO₂-equivalent emissions from those F-GHGs. In contrast, the GWP of SF₆, another significant contributor to total emissions in this source category, has increased, leading to an increase in calculated CO₂-equivalent emissions for this F-GHG. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO2-equivalent emissions across the time series 1990-2020 for CF₄, C₂F₆, NF₃, and SF₆ were 11 percent decrease, 9 percent decrease, 9 percent decrease, and 8 percent increase, respectively. The net impact from these updates and the additional updates noted above was an average annual 7.5 percent decrease in CO₂-equivalent emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

The Inventory methodology uses data reported through the EPA Partnership (for earlier years) and EPA's GHGRP (for later years) to extrapolate the emissions of the non-reporting population. While these techniques are well developed, the understanding of the relationship between the reporting and non-reporting populations is limited. Further analysis of the reporting and non-reporting populations could aid in the accuracy of the non-reporting population extrapolation in future years. In addition, the accuracy of the emissions estimates for the non-reporting population could be further increased through EPA's further investigation of and improvement upon the accuracy of estimated activity in the form of TMLA.

The Inventory uses utilization from two different sources for various time periods-SEMI to develop PEVM and to estimate non-Partner emissions for the period 1995 to 2010 and U.S. Census Bureau for 2011 through 2021. SEMI reported global capacity utilization for manufacturers through 2011. U.S. Census Bureau capacity utilization include U.S. semiconductor manufacturers as well as assemblers. Further analysis on the impacts of using a new and different source of utilization data could prove to be useful in better understanding of industry trends and impacts of utilization data sources on historical emission estimates.

Estimates of semiconductor non-reporter and non-Partner emissions are based on EPA-developed emission factors for the time periods pre-2010, 2011 through 2012, and 2015 through 2021. Based on the data available for these time periods, the methods used to develop emission factors for non-reporters and non-Partners are slightly inconsistent for semiconductors (e.g., how data representing emissions and TMLA from the manufacture of various wafer sizes are aggregated or disaggregated for purposes of calculating emission factors). Further analyses to support potentially adjusting the methods for developing these emission factors could be done to better ensure consistency across the time series.

The methodology for estimating semiconductor emissions from non-reporters uses data from the International Technology Roadmap for Semiconductors (ITRS) on the number of layers associated with various technology node sizes. The ITRS has now been replaced by the International Roadmap for Devices and Systems (IRDS), which has published updated data on the number of layers used in each device type and node size (in nanometers). Incorporating this updated dataset will improve the accuracy of emissions estimates from non-reporting semiconductor fabs.

Substitution of Ozone Depleting Substances (CRF Source Category 2F)

Hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and carbon dioxide (CO₂) are used as alternatives to several classes of ozone-depleting substances (ODSs) that are being phased out under the terms of the Montreal Protocol and the Clean Air Act Amendments of 1990. 96 Ozone-depleting substances—chlorofluorocarbons (CFCs), halons, carbon tetrachloride, methyl chloroform, and hydrochlorofluorocarbons (HCFCs) — are used in a variety of industrial applications including refrigeration and air conditioning equipment, solvent cleaning, foam production, sterilization, fire extinguishing, and aerosols. Although HFCs and PFCs are not harmful to the stratospheric ozone layer, they are potent greenhouse gases. On December 27, 2020, the American Innovation and Manufacturing (AIM) Act was enacted by Congress and directs EPA to address HFCs by phasing down production and consumption (i.e., production plus import minus export), maximizing reclamation and minimizing releases from equipment, and facilitating the transition to next-generation technologies through sector-based restrictions. Emission estimates for HFCs, PFCs, and CO₂ used as substitutes for ODSs are provided in Table 4-113 and Table 4-114.⁹⁷

Table 4-113: Emissions of HFCs, PFCs, and CO₂ from ODS Substitutes (MMT CO₂ Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
HFC-23	0.0	+	+	+	+	+	+
HFC-32	0.0	0.3	5.3	6.1	6.8	7.7	9.4

⁹⁶ [42 U.S.C § 7671, CAA Title VI].

⁹⁷ Emissions of ODSs are not included here consistent with UNFCCC reporting guidelines for national inventories noted in Box 4-1. See Annex 6.2 for more details on emissions of ODSs. Emissions from CO₂ used in the food and beverage industry are separately reported in Chapter 4.15 Carbon Dioxide Consumption but does not include CO2 in ODS substitute use sectors as a refrigerant, foam blowing agent, or fire extinguishing agent.

HFC-125	+	8.2	45.4	48.6	52.9	57.5	65.9
HFC-134a	+	72.8	58.8	56.4	55.3	54.1	50.0
HFC-143a	+	10.0	30.1	29.7	29.9	29.9	30.0
HFC-236fa	0.0	0.9	1.0	0.9	0.9	0.9	0.8
CF ₄	0.0	+	+	+	+	+	+
CO ₂	+	+	+	+	+	+	+
Others ^a	0.3	7.1	15.5	16.0	16.1	15.9	16.3
Total	0.3	99.4	156.1	157.8	162.0	166.1	172.5

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 4-114: Emissions of HFCs, PFCs, and CO₂ from ODS Substitution (Metric Tons)

Gas	1990	2005	2017	2018	2019	2020	2021
HFC-23	0	1	2	2	2	2	2
HFC-32	0	397	7,832	8,937	10,077	11,374	13,846
HFC-125	+	2,580	14,308	15,335	16,682	18,153	20,803
HFC-134a	+	56,029	45,264	43,419	42,558	41,590	38,447
HFC-143a	+	2,093	6,264	6,188	6,230	6,234	6,240
HFC-236fa	0	118	124	118	112	108	104
CF ₄	0	2	6	7	7	7	8
CO ₂	14	1,325	2,879	3,093	3,303	3,516	3,734
Othersa	М	М	М	M	M	M	М

⁺ Does not exceed 0.5 MT.

In 1990 and 1991, the only significant emissions of HFCs and PFCs as substitutes to ODSs were relatively small amounts of HFC-152a—used as an aerosol propellant and also a component of the refrigerant blend R-500 used in chillers. Beginning in 1992, HFC-134a was used in growing amounts as a refrigerant in motor vehicle air-conditioners and in refrigerant blends such as R-404A. ⁹⁸ In 1993, the use of HFCs in foam production began, and in 1994 ODS substitutes for halons entered widespread use in the United States as halon production was phased out. In 1995, these compounds also found applications as solvents. Non-fluorinated ODS substitutes, such as CO₂, have been used in place of ODS in certain foam production and fire extinguishing uses since the 1990s.

The use and subsequent emissions of HFCs, PFCs, and CO_2 as ODS substitutes has been increasing from small amounts in 1990 to 172.5 MMT CO_2 Eq. emitted in 2021. This increase was in large part the result of efforts to phase out CFCs, HCFCs, and other ODSs in the United States. Use and emissions of HFCs are expected to start decreasing in the next few years and continue downward as production and consumption of HFCs are phased down to 15 percent of their baseline levels by 2036 through an allowance allocation and trading program established by EPA. Improvements in recovery practices and the use of alternative gases and technologies, through

 $^{^{\}rm a}$ Others represent an unspecified mix of HFCs and PFCs, which includes HFC-152a, HFC-227ea, HFC-245fa, HFC-365mfc, HFC-43-10mee, HCFO-1233zd(E), HFO-1234yf, HFO-1234ze(E), HFO-1336mzz(Z), C₄F₁₀, and PFC/PFPEs, the latter being a proxy for a diverse collection of PFCs and perfluoropolyethers (PFPEs) employed for solvent applications. For estimating purposes, the GWP value used for PFC/PFPEs was based upon n-C₆F₁₄.

M (Mixture of Gases).

^a Others represent an unspecified mix of HFCs and PFCs, which includes HFC-152a, HFC-227ea, HFC-245fa, HFC-365mfc, HFC-43-10mee, HCFO-1233zd(E), HFO-1234yf, HFO-1234ze(E), HFO-1336mzz(Z), C₄F₁₀, and PFC/PFPEs, the latter being a proxy for a diverse collection of PFCs and perfluoropolyethers (PFPEs) employed for solvent applications.

⁹⁸ R-404A contains HFC-125, HFC-143a, and HFC-134a.

voluntary actions and in response to potential future regulations under the AIM Act, will also contribute to a reduction in HFC use and emissions.

Table 4-115 presents emissions of HFCs, PFCs, and CO₂ as ODS substitutes by end-use sector for 1990 through 2021. The refrigeration and air-conditioning sector is further broken down by sub-sector. The end-use sectors that contributed the most toward emissions of HFCs, PFCs, and CO2 as ODS substitutes in 2021 include refrigeration and air-conditioning (139.1 MMT CO₂ Eq., or approximately 81 percent), aerosols (17.7 MMT CO₂ Eq., or approximately 10 percent), and foams (10.8 MMT CO₂ Eq., or approximately 6 percent). Within the refrigeration and airconditioning end-use sector residential unitary AC, part of the Residential Stationary Air-conditioning subsector shown below, was the highest emitting end-use (38.5 MMT CO₂ Eq.), followed by large retail food, which is part of the Commercial Refrigeration subsector. Each of the end-use sectors is described in more detail below.

Table 4-115: Emissions of HFCs, PFCs, and CO₂ from ODS Substitutes (MMT CO₂ Eq.) by Sector

Sector	1990	2005	2017	2018	2019	2020	2021
Refrigeration/Air Conditioning	+	83.0	120.2	122.4	126.2	130.3	139.1
Commercial Refrigeration	+	14.9	40.8	39.6	40.2	40.6	41.0
Domestic Refrigeration	+	0.2	1.2	1.2	1.2	1.2	1.1
Industrial Process							
Refrigeration	+	1.8	12.6	13.8	15.0	16.2	17.4
Transport Refrigeration	+	1.6	6.4	6.9	7.4	7.9	8.4
Mobile Air Conditioning	+	61.5	30.7	28.7	26.6	24.6	22.9
Residential Stationary Air							
Conditioning	+	1.2	22.8	26.0	29.1	32.9	41.1
Commercial Stationary Air							
Conditioning	+	1.7	5.7	6.2	6.6	6.9	7.3
Aerosols	0.2	10.2	17.7	16.7	17.0	17.3	17.7
Foams	+	3.5	13.8	14.2	14.1	13.7	10.8
Solvents	+	1.6	1.9	2.0	2.0	2.0	2.1
Fire Protection	+	1.1	2.4	2.6	2.7	2.7	2.8
Total	0.3	99.4	156.1	157.8	162.0	166.1	172.5

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Refrigeration/Air Conditioning

The refrigeration and air-conditioning sector includes a wide variety of equipment types that have historically used CFCs or HCFCs. End-uses within this sector include motor vehicle air-conditioning, retail food refrigeration, refrigerated transport (e.g., ship holds, truck trailers, railway freight cars), household refrigeration, residential and small commercial air-conditioning and heat pumps, chillers (large comfort cooling), cold storage facilities, and industrial process refrigeration (e.g., systems used in food processing, chemical, petrochemical, pharmaceutical, oil and gas, and metallurgical industries). As the ODS phaseout has taken effect, most equipment has been retrofitted or replaced to use HFC-based substitutes. Common HFCs in use today in refrigeration/air-conditioning equipment are HFC-134a, R-410A, ⁹⁹ R-404A, and R-507A. ¹⁰⁰ Lower-GWP options such as hydrofluoroolefin (HFO)-1234yf in motor vehicle air-conditioning, R-717 (ammonia) in cold storage and industrial applications, and R-744 (carbon dioxide) and HFC/HFO blends in retail food refrigeration, are also being used. Manufacturers of residential and

⁹⁹ R-410A contains HFC-32 and HFC-125.

 $^{^{100}}$ R-507A, also called R-507, contains HFC-125 and HFC-143a.

commercial air conditioning have announced their plans to use HFC-32 and R-454B ¹⁰¹ in the future, and at least one manufacturer has announced the availability of chillers operating on HFC-32 as of 2023 (Carrier, 2023). These refrigerants are emitted to the atmosphere during equipment operation (as a result of component failure, leaks, and purges), as well as at manufacturing (if charged at the factory), installation, servicing, and disposal events.

Aerosols

Aerosol propellants are used in metered dose inhalers (MDIs) and a variety of personal care products and technical/specialty products (e.g., duster sprays and safety horns). Pharmaceutical companies that produce MDIs—a type of inhaled therapy used to treat asthma and chronic obstructive pulmonary disease—have replaced the use of CFCs with HFC-propellant alternatives. The earliest ozone-friendly MDIs were produced with HFC-134a, but the industry is using HFC-227ea as well. Conversely, since the use of CFC propellants in other types of aerosols was banned in 1978, most non-medical consumer aerosol products have not transitioned to HFCs, but to "not-in-kind" technologies, such as solid or roll-on deodorants and finger-pump sprays. The transition away from ODSs in specialty aerosol products has also led to the introduction of non-fluorocarbon alternatives (e.g., hydrocarbon propellants) in certain applications, in addition to HFC-134a or HFC-152a. Other low-GWP options such as HFO-1234ze(E) are being used as well. These propellants are released into the atmosphere as the aerosol products are used.

Foams

Chlorofluorocarbons and HCFCs have traditionally been used as foam blowing agents to produce polyurethane (PU), polystyrene, polyolefin, and phenolic foams, which are used in a wide variety of products and applications. Since the *Montreal Protocol*, flexible PU foams as well as other types of foam, such as polystyrene sheet, polyolefin, and phenolic foam, have transitioned almost completely away from fluorocompounds into alternatives such as CO₂ and hydrocarbons. The majority of rigid PU foams have transitioned to HFCs—primarily HFC-134a and HFC-245fa. Today, these HFCs are used to produce PU appliance, PU commercial refrigeration, PU spray, and PU panel foams—used in refrigerators, vending machines, roofing, wall insulation, garage doors, and cold storage applications. In addition, HFC-152a, HFC-134a, and CO₂ are used to produce polystyrene sheet/board foam, which is used in food packaging and building insulation. Low-GWP fluorinated foam blowing agents in use include HFO-1234ze(E) and HCFO-1233zd(E). Emissions of blowing agents occur when the foam is manufactured as well as during the foam lifetime and at foam disposal, depending on the particular foam type.

Solvents

Chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), and to a lesser extent carbon tetrachloride (CCl₄) were historically used as solvents in a wide range of cleaning applications, including precision, electronics, and metal cleaning. Since their phaseout, metal cleaning end-use applications have primarily transitioned to non-fluorocarbon solvents and not-in-kind processes. The precision and electronics cleaning end-uses have transitioned in part to high-GWP gases, due to their high reliability, excellent compatibility, good stability, low toxicity, and selective solvency. These applications rely on HFC-43-10mee, HFC-365mfc, HFC-245fa, and to a lesser extent, PFCs. Electronics cleaning involves removing flux residue that remains after a soldering operation for printed circuit boards and other contamination-sensitive electronics applications. Precision cleaning may apply to either electronic components or to metal surfaces, and is characterized by products, such as disk drives, gyroscopes, and optical components, that require a high level of cleanliness and generally have complex shapes, small clearances, and other cleaning challenges. The use of these solvents yields fugitive emissions of these HFCs and PFCs.

¹⁰¹ R-454B contains HFC-32 and HFO-1234yf.

Fire Protection

Fire protection applications include portable fire extinguishers ("streaming" applications) that originally used halon 1211, and total flooding applications that originally used halon 1301, as well as some halon 2402. Since the production and import of virgin halons were banned in the United States in 1994, the halon replacement agent of choice in the streaming sector has been dry chemical, although HFC-236fa is also used to a limited extent. In the total flooding sector, HFC-227ea has emerged as the primary replacement for halon 1301 in applications that require clean agents. Other HFCs, such as HFC-23 and HFC-125, are used in smaller amounts. The majority of HFC-227ea in total flooding systems is used to protect essential electronics, as well as in civil aviation, military mobile weapons systems, oil/gas/other process industries, and merchant shipping. Fluoroketone FK-5-1-12 is also used as a low-GWP option and 2-BTP is being considered. As fire protection equipment is tested or deployed, emissions of these fire protection agents occur.

Methodology and Time-Series Consistency

A detailed Vintaging Model of ODS-containing equipment and products was used to estimate the actual—versus potential—emissions of various ODS substitutes, including HFCs, PFCs, and CO₂. The name of the model refers to the fact that it tracks the use and emissions of various compounds for the annual "vintages" of new equipment that enter service in each end-use. The Vintaging Model predicts ODS and ODS substitute use in the United States based on modeled estimates of the quantity of equipment or products sold each year containing these chemicals and the amount of the chemical required to manufacture and/or maintain equipment and products over time. Emissions for each end-use were estimated by applying annual leak rates and release profiles, which account for the lag in emissions from equipment as they leak over time. By aggregating the data for 78 different end-uses, the model produces estimates of annual use and emissions of each compound. Further information on the Vintaging Model is contained in Annex 3.9.

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Given that emissions of ODS substitutes occur from thousands of different kinds of equipment and from millions of point and mobile sources throughout the United States, emission estimates must be made using analytical tools such as the Vintaging Model or the methods outlined in IPCC (2006). Though the model is more comprehensive than the IPCC default methodology, significant uncertainties still exist with regard to the levels of equipment sales, equipment characteristics, and end-use emissions profiles that were used to estimate annual emissions for the various compounds.

The uncertainty analysis quantifies the level of uncertainty associated with the aggregate emissions across the 78 end-uses in the Vintaging Model. In order to calculate uncertainty, functional forms were developed to simplify some of the complex "vintaging" aspects of some end-use sectors, especially with respect to refrigeration and air-conditioning, and to a lesser degree, fire extinguishing. These sectors calculate emissions based on the entire lifetime of equipment, not just equipment put into commission in the current year, thereby necessitating simplifying equations. The functional forms used variables that included growth rates, emission factors, transition from ODSs, change in charge size as a result of the transition, disposal quantities, disposal emission rates, and either stock (e.g., number of air conditioning units in operation) for the current year or ODS consumption before transition to alternatives began (e.g., in 1985 for most end-uses). Uncertainty was estimated around each variable within the functional forms based on expert judgment, and a Monte Carlo analysis was performed.

The most significant sources of uncertainty for the ODS Substitutes source category include the total stock of refrigerant installed in industrial process refrigeration and cold storage equipment, as well as the charge size for technical aerosols using HFC-134a.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-116. Substitution of ozone depleting substances HFC and PFC emissions were estimated to be between 165.2 and 197.8 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 4.2 percent below to 14.7 percent above the emission estimate of 172.5 MMT CO_2 Eq.

Table 4-116: Approach 2 Quantitative Uncertainty Estimates for HFC and PFC Emissions from ODS Substitutes (MMT CO₂ Eq. and Percent)

		2021 Emission Estimate	Uncerta	ainty Range R	elative to Emiss	ion Estimate ^a
Source	Gases	(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)	
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Substitution of Ozone	HFCs and	172.5	165.2	197.8	-4.2%	+14.7%
Depleting Substances	PFCs	1/2.5	105.2	197.8	-4.2%	+14.7%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter. Category specific QA/QC findings are described below.

The QA and verification process for individual gases and sources in the Vintaging Model includes review against upto-date market information, including equipment stock estimates, leak rates, and sector transitions to new chemicals and technologies. In addition, comparisons against published emission and consumption sources by gas and by source are performed when available as described further below. Independent peer reviews of the Vintaging Model are periodically performed, including one conducted in 2017 (EPA 2018), to confirm Vintaging Model estimates and identify updates. For the purposes of reporting emissions to protect Confidential Business Information (CBI), some HFCs and PFCs are grouped into an unspecified mix. The HFCs and PFCs within this unspecified mix of HFCs and PFCs are modelled and verified individually in the same process as all other gases and sources in the Vintaging Model.

Comparison of Reported Consumption to Modeled Consumption of HFCs

Data from EPA's Greenhouse Gas Reporting Program (GHGRP)¹⁰² was also used to perform quality assurance as a reference scenario check on the modeled net supply of HFCs, from which the modeled emissions from this source category are derived as specified in 2006 IPCC Guidelines for National Greenhouse Gas Inventories.

Reported Net Supply (GHGRP Top-Down Estimate). Consumption patterns demonstrated through data reported under GHGRP Subpart OO (Suppliers of Industrial Greenhouse Gases) and Subpart QQ (Importers and Exporters of Fluorinated Greenhouse Gases Contained in Pre-Charged Equipment or Closed-Cell Foams) were compared to the modeled demand for new saturated HFCs used as ODS substitutes from the Vintaging Model. The collection of data from suppliers of HFCs enables EPA to calculate the reporters' aggregated net supply—the sum of the quantities of chemical produced or imported into the United States less the sum of the quantities of chemical

¹⁰² For the GHGRP data, EPA verifies annual facility-level and company-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data.

transformed (used as a feedstock in the production of other chemicals), destroyed, or exported from the United States. 103 This allows for an overall quality assurance check on the modeled demand for new chemical in the Vintaging Model as a proxy for total amount supplied, which is similar to net supply, as an input to the emission calculations in the model. Under EPA's GHGRP, suppliers (i.e., producers, importers, and exporters) of HFCs under Subpart OO¹⁰⁴ began annually reporting their production, transformation, destruction, imports, and exports to EPA in 2011 (for supply that occurred in 2010) and suppliers of HFCs under Subpart QQ began annually reporting their imports and exports to EPA in 2012 (for supply that occurred in 2011).

Document 15-20

Note, GHGRP data reported under subparts QQ and OO are not used directly to estimate emissions of ODS Substitutes because they do not include complete information on the sectors or end-uses in which that chemical will be used. Therefore, it does not provide the data that would be needed to calculate the source or time that a chemical is emitted. Reports to the GHGRP on production and bulk import (Subpart OO) do not currently include any information on expected end-uses. Published data on fluorinated gases contained in pre-charged equipment and closed-cell foams (Subpart QQ) does not provide information on the type of product imported or exported. Furthermore, the information from both subparts would not capture the entire market in the United States.

Modeled Consumption (Vintaging Model Bottom-Up Estimate). The Vintaging Model, used to estimate emissions from this source category, calculates chemical demand based on the quantity of equipment and products sold, serviced and retired each year, and the amount of the chemical required to manufacture and/or maintain the equipment and products on an end-use basis. ¹⁰⁵ It is assumed that the total demand equals the amount supplied by either new production, chemical import, or quantities recovered (often reclaimed) and placed back on the market. In the Vintaging Model, demand for new chemical, as a proxy for consumption, is calculated as any chemical demand (either for new equipment or for servicing existing equipment) that cannot be met through recycled or recovered material. 106 No distinction is made in the Vintaging Model between whether that need is met through domestic production or imports. To calculate emissions, the Vintaging Model estimates the quantity released from equipment over time, which varies by product type as detailed in Annex 3.9.1. Thus, verifying the Vintaging Model's calculated consumption against GHGRP reported data, which does not provide details on the end-uses where the chemical is used, is not an exact comparison of the Vintaging Model's emission estimates, but is believed to provide an overall check of the underlying data.

Overall, the Vintaging Model estimates for consumption are lower than the GHGRP data by an average of 13.5 percent across the time series (i.e., 2012 through 2021). The difference is greatest during the last four years (2018 through 2021). A summary of findings from this comparison, potential causes for differences, and related planned improvements are discussed below. Annex 3.9.2 provides additional information on the comparison of the data from the GHGRP and Vintaging Model, and a more detailed discussion of the results.

Industrial Processes and Product Uses 4-145

¹⁰³ Chemical that is exported, transformed, or destroyed—unless otherwise imported back to the United States—will never be emitted in the United States.

¹⁰⁴ Among other provisions, the AIM Act of 2020 directed EPA to develop a U.S. production baseline and a U.S. consumption baseline and to phase down HFC production and consumption relative to those baselines. Data reported to the GHGRP under Subpart OO are relevant to the production and consumption baselines. The data below include aggregated Subpart OO data for AIM-listed HFCs for reporting years 2012 through 2021 from all companies that reported AIM-listed HFCs, though not all species were reported in each reporting year.

¹⁰⁵ The model builds an inventory of the in-use stock of equipment and products and ODSs and HFCs in each of the subapplications. Emissions are subsequently estimated by applying annual and disposal emission rates to each population of equipment and products. See Annex 3.9.1. for further details on the model.

¹⁰⁶ The Vintaging Model does not calculate "consumption" as defined under the Montreal Protocol and the AIM Act, because the model includes chemical supplied to pre-charge equipment made overseas and sent to the domestic market and does not include chemical produced or imported in the United States but placed in products shipped to foreign markets.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 443 of 1050 PageID 3891

Comparison of Emissions Derived from Atmospheric Measurements to Modeled Emissions

Emissions of some fluorinated greenhouse gases are estimated for the contiguous United States by scientists at the National Oceanic and Atmospheric Administration (NOAA) and were used to perform additional quality control by comparing the emission estimates derived from atmospheric measurements by NOAA to the bottom-up emission estimates from the Vintaging Model. The 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2019) Volume 1: General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. Further, it identified fluorinated gases as one of most suitable greenhouse gases for such comparisons. The 2019 Refinement makes this conclusion on fluorinated gases based on the lack of natural sources, the potential uncertainties in bottom-up inventory methods for some sources, the long life of many of these gases, and the well-known loss mechanisms. Unlike the more abundant gases in the Inventory, since there are no known natural sources of HFCs, the HFC emission sources included in this Inventory account for the majority of total emissions detectable in the atmosphere, and the estimates derived from atmospheric measurements are driven solely by anthropogenic emissions.

The 2019 Refinement provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC 2019 Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC 2019 Volume 1, Chapter 6).

Emission estimates for four key HFCs (HFC-134a, HFC-125, HFC-143a, and HFC-32) from atmosphere measurements for 2008 through 2014 (Hu et al., 2017) were examined in the 2022 Inventory (EPA 2022b). Recently updated estimates from 2008 through 2020 inferred from the same methodology (Hu et al., 2022; Montzka et al., 2023), available at Hu et al. (2023), were used here for an updated comparison over a longer time series. This provides a quality check on the modeled emissions reported above. Annex 3.9.2 provides additional details on the data from NOAA as compared to the Vintaging Model and a more detailed discussion of the results. Potential Inventory updates identified due to the current comparison with atmospheric-derived emission estimates are noted in the Planned Improvements section below.

Summary of Comparisons

Comparing the Vintaging Model's estimates to GHGRP-reported estimates of supply and emissions estimates derived from atmospheric measurements, particularly for more widely used chemicals, can help validate the model. These comparisons show that Vintaging Model consumption estimates are well within the same order of magnitude as the actual consumption data as reported to EPA's GHGRP although the differences in reported net supply and modeled demand are still significant, in particular for more recent years. Using a Tier 2 bottom-up modeling methodology to estimate emissions requires assumptions and expert judgment so it is expected that the model will have limitations. The differences (i.e., higher net supply seen in GHGRP compared to the modeled supply) are likely due in part to temporal discrepancies, including 1) the top-down data are reported at the time of actual production or import, and the bottom-up data are calculated at the time of actual placement on the market and 2) stockpiling of chemicals by suppliers and distributors to produce or import additional quantities of HFCs for various reasons such as expectations that prices may increase, or supplies may decrease, in the future (e.g., in response to regulations under the AIM Act). Based on information collected by the EPA during previous ODS phasedowns at the time, such stockpiling behavior was seen, and it is concluded that such behavior similarly exists amongst HFC suppliers in anticipation of current and recently promulgated controls on HFCs. Any such activity would increase the GHGRP data as compared to the modeled data. This effect is likely the major reason why there is a divergence in this comparison, with the GHGRP data in 2017 through 2021 (i.e., the years following agreement of the Kigali Amendment to the Montreal Protocol) significantly higher than the modeled data and the final year before AIM regulations took effect. Improvements of the model methodology to incorporate a temporal factor could be investigated. Additional discussion on potential reasons for differences are discussed in Annex 3.9.2.

The comparisons of modeled emissions for four key HFCs show reasonable agreement with atmospheric measurement derivations of emissions from Hu et al. (2023), though certain chemicals and during certain years

differences can be significant. From consideration of EPA and NOAA results, EPA finds that emissions of HFC-32 and HFC-125, used predominantly in the stationary air conditioning sector, are increasing relatively rapidly. On the other hand, emissions for HFC-143a have stabilized, consistent with less use of this chemical due to the transition away from higher-GWP refrigerants (e.g., R-404A to R-407A in commercial refrigeration). Magnitudes of emission for HFC-134a, the HFC emitted in the largest quantities from the United States, are fairly similar on average when estimated from either approach over the 2008-2020 period, but the decrease derived from the inventory analysis does not appear to be reflected in the atmosphere-derived estimates. Hence, areas for further research that may improve the modeling are highlighted in the Planned Improvements section.

Considering the strengths and weaknesses of three independent approaches for estimating consumption and emissions of these HFCs, in most instances the estimates provide added confidence in EPA's understanding of total U.S. emissions for these chemicals and how they've change over time and, furthermore, the comparisons have helped identify areas for potential improvement in the future. Annex 3.9.2 provides a more detailed discussion of the results.

Recalculations Discussion

For the current Inventory, updates to the Vintaging Model included updating 2021 growth rates for residential and commercial unitary air-conditioning to align with annual sales estimates published by AHRI. Projected growth rates were updated for residential unitary air-conditioning to align with projected residential housing available from the Energy Information Administration (EIA) and commercial unitary air-conditioning growth rates were updated based on new commercial floorspace growth projections from EIA (EPA 2022a).

Refrigerant transitions for road transport and modern rail transport were updated to reflect manufacturer announcements regarding the use of R-452A in place of R-404A (EPA 2022b). Manufacturing emissions for domestic refrigerator foam were adjusted to only include equipment manufactured within the United States, including those that are produced for export, and excluding those that are imported with foam.

The current Inventory also began reporting CO₂ emissions from ODS substitute use as a refrigerant, foam blowing agent, and fire extinguishing agent. The impact of this addition has very little effect to total emissions across the timer series; for example, CO₂ emissions represent 0.002 percent of CO₂-equivalent total emissions in 2021.

In addition, for the current Inventory, CO2-equivalent emissions totals of HFCs and PFCs from ODS substitutes have been revised to reflect the 100-year GWPs provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in AR4 (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWPs of HFC-134a and HFC-125, the two most significant contributors to total emissions in this source category, have decreased, from 1,430 to 1,300 and from 3,500 to 3,170, respectively, leading to a decrease in calculated CO₂-equivalent emissions for those HFCs. In contrast, the GWPs of HFC-32 and HFC-143a, the third and fourth most significant contributors to total emissions in this source category, have increased, from 675 to 677 and from 4,470 to 4,800, respectively, leading to an increase in calculated CO₂-equivalent emissions for those HFCs. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual changes in CO₂-equivalent emissions across the time series 1990-2020 for the four most prevalent HFCs were a 9 percent decrease for HFC-134a, 9 percent decrease for HFC-125, 0.3 percent increase for HFC-32, and 7 percent increase for HFC-143a. The net impact from these updates and the additional updates noted above was an average annual 5.6 percent decrease in total emissions for the time series. Further discussion on this update and the overall impacts of updating the GWPs values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Future improvements to the Vintaging Model are planned for the Refrigeration and Air-conditioning, Fire Suppression, and Aerosols sectors. Specifically, refrigerated storage space estimates published biannually from the United States Department of Agriculture (USDA) are being compared to cold storage warehouse space currently

estimated in the Vintaging Model. EPA is also reviewing the addition of an end-use representing multi-split air-conditioning units. Streaming agent fire suppression lifetimes, market size, and growth rates and flooding agent fire suppression market transitions are under review to align more closely with real world activities. In addition, further refinement of HFC consumption in MDIs is expected from review of data collected on HFC use for MDI production, imports, and exports in response to requests for application-specific allowances for MDIs. EPA expects these revisions to be prepared for the 2024 or 2025 Inventory submission.

As discussed above, future reporting under the AIM Act may provide useful information for verification purposes and possible improvements to the Vintaging Model, such as information on HFC stockpiling behaviors. EPA expects this reporting by early 2023 and incorporation into the 2024 or 2025 report. Should the data suggest structural changes to the model, such as the handling of stockpiles before use, EPA expects to introduce the revised model for the 2025 or 2026 Inventory submission.

Several potential improvements to the Inventory were identified in the 2022 Inventory submission based on the comparisons discussed above—net supply values from the GHGRP and emission estimates derived from atmospheric measurements—and remain valid. To estimate HFC emissions for just the contiguous United States, matching the coverage by the atmospheric measurements, EPA will investigate the availability of data from Alaska, Hawaii, and U.S. territories. This is planned by the 2025 Inventory submission. To improve estimates of HFC-125 and HFC-143a, further research into the refrigeration market can be made. Research in this industry on the shift away from blends such as R-404A or success in lowering emission rates could be used to improve the Inventory estimate. This is planned for the 2024 Inventory cycle. That said, for the years where both the atmospheric measurements and the model display a roughly constant emission of HFC-143a at similar levels, the new results suggest robust estimates for the refrigeration market. Uncertainty estimates by species would aid in comparisons to atmospheric data. EPA will explore the possibility of revising the Monte Carlo analysis to differentiate between species, starting with the higher-emitted HFCs identified above, in a future (i.e., 2024 or 2025) Inventory submission. Reclamation reports and, when available, information gathered under the AIM Act, could be used to improve the understanding of how chemical moves through the economy and could resolve some of the temporal effects discussed in Annex 3.9.2. This would likely require revisions to the basic model structure and could be introduced for the 2025 or 2026 Inventory submission. The additional data from the atmospheric measurements suggests additional items to investigate. The faster uptick in HFC-32 and HFC-125 emissions suggests additional emissions of R-410A compared to the model's estimation. Further investigation into the emission rate, whether that varies over time, stocks, lifetimes, and other factors will be investigated for the 2025 Inventory submission.

4.25 Electrical Transmission and Distribution (CRF Source Category 2G1)

The largest use of sulfur hexafluoride (SF₆), both in the United States and internationally, is as an electrical insulator and interrupter in equipment that transmits and distributes electricity (RAND 2004). The gas has been employed by the electric power industry in the United States since the 1950s because of its dielectric strength and arc-quenching characteristics. It is used in gas-insulated substations, circuit breakers, and other switchgear. SF₆ has replaced flammable insulating oils in many applications and allows for more compact substations in dense urban areas. Another greenhouse gas emitted in much smaller amounts by the electric power industry is tetrafluoromethane (CF₄), which is mixed with SF₆ to avoid liquefaction at low temperatures (Middleton 2000). While mixed gas circuit breakers are more common in extremely cold climates in geographies outside of the United States, some U.S. manufacturers of electrical equipment are emitting CF₄ during the manufacturing of equipment designed to hold the SF₆/CF₄ gas mixture. However, no electrical transmission and distribution facilities in the United States have reported emissions of or equipment using CF₄. SF₆ emissions exceed PFC emissions from electric power systems on both a GWP-unweighted and GWP-weighted basis.

Fugitive emissions of SF₆ and CF₄ can escape from gas-insulated substations and switchgear through seals, especially from older equipment. The gas can also be released during equipment manufacturing, installation, servicing, and disposal. Emissions of SF₆ and CF₄ from equipment manufacturing and from electrical transmission and distribution systems were estimated to be 5.98 MMT CO₂ Eq. (0.3 kt) in 2021. This quantity represents a 76 percent decrease from the estimate for 1990 (see Table 4-117 and Table 4-118). There are a few potential causes for this decrease: a sharp increase in the price of SF₆ during the 1990s and a growing awareness of the environmental impact of SF₆ emissions through programs such as EPA's voluntary SF₆ Emission Reduction Partnership for Electric Power Systems (Partnership) and EPA's GHGRP, regulatory drivers at the state and local levels, and research and development of alternative gases to SF₆ that can be used in gas-insulated substations. Utilities participating in the Partnership have lowered their emission factor from 13 percent in 1999 (kg SF₆ emitted per kg of nameplate capacity) to 1 percent in 2021. SF₆ emissions reported by electric power systems to EPA's GHGRP have decreased by 42 percent from 2011 to 2021, ¹⁰⁷ with much of the reduction seen from utilities that are not participants in the Partnership. These utilities may be making relatively large reductions in emissions as they take advantage of relatively large and/or inexpensive emission reduction opportunities (i.e., "low hanging fruit," such as replacing major leaking circuit breakers) that Partners have already taken advantage of under the voluntary program (Ottinger et al. 2014). However, total emissions from electrical transmission and distribution in 2021 were higher than 2020 emissions, increasing by 2.17 percent, largely due to a large increase in transmission miles.

Table 4-117: SF₆ and CF₄ Emissions from Electric Power Systems and Electrical Equipment Manufacturers (MMT CO₂ Eq.)

		Electrical	
	Electric Power	Equipment	
Year	Systems	Manufacturers	Total
1990	24.3	0.3	24.7
2005	11.2	0.7	11.8
2017	5.2	0.3	5.5
2018	4.9	0.3	5.2
2019	5.7	0.4	6.1
2020	5.3	0.5	5.9
2021	5.6	0.4	6.0

Note: Totals may not sum due to independent rounding.

 $^{^{107}}$ Analysis of emission trends from facilities reporting to EPA's GHGRP is imperfect due to an inconsistent group of reporters year to year. A facility that has reported total non-biogenic greenhouse gas emissions below 15,000 metric tons of carbon dioxide equivalent (MT CO₂ Eq.) for three consecutive years or below 25,000 MT CO₂ Eq. for five consecutive years to EPA's GHGRP can discontinue reporting for all direct emitter subparts. For this sector, most of the variability in the group of reporters is due to facilities exiting the GHGRP due to being below one of these thresholds; however, facilities must re-enter the program if their emissions at a later date are above 25,000 MT CO₂ Eq., which may occur for a variety of reasons, including changes in facility size and changes in emission rates.

Table 4-118: SF₆ and CF₄ Emissions from Electric Power Systems and Electrical Equipment Manufacturers (kt)

Year	SF ₆ Emissions	CF ₄ Emissions
1990	1.0	NO
2005	0.5	0.00031
2017	0.2	+
2018	0.2	NO
2019	0.3	0.00006
2020	0.2	0.00002
2021	0.3	0.00016

⁺ Does not exceed 0.000005 kt.

NO (Not Occurring)

Methodology and Time-Series Consistency

The estimates of emissions from Electrical Transmission and Distribution are comprised of emissions from electric power systems and emissions from the manufacture of electrical equipment. The methodologies for estimating both sets of emissions are described below.

1990 through 1998 Emissions from Electric Power Systems

Emissions from electric power systems from 1990 through 1998 were estimated based on (1) the emissions estimated for this source category in 1999, which, as discussed in the next section, were based on the emissions reported during the first year of EPA's SF₆ Emission Reduction Partnership for Electric Power Systems (Partnership), and (2) the RAND survey of global SF₆ emissions. Because most utilities participating in the Partnership reported emissions only for 1999 through 2011, modeling was used to estimate SF₆ emissions from electric power systems for the years 1990 through 1998. To perform this modeling, U.S. emissions were assumed to follow the same trajectory as global emissions from this source during the 1990 through 1999 period. To estimate global emissions, the RAND survey of global SF₆ sales was used, together with the following equation for estimating emissions, which is derived from the mass-balance equation for chemical emissions (Volume 3, Equation 7.3) in the 2006 IPCC Guidelines. ¹⁰⁸ (Although Equation 7.3 of the 2006 IPCC Guidelines appears in the discussion of substitutes for ozone-depleting substances, it is applicable to emissions from any long-lived pressurized equipment that is periodically serviced during its lifetime.)

Equation 4-23: Estimation for SF₆ Emissions from Electric Power Systems

Emissions (kilograms SF_6) = SF_6 purchased to refill existing equipment (kilograms) + nameplate capacity of retiring equipment (kilograms) 109

Note that the above equation holds whether the gas from retiring equipment is released or recaptured; if the gas is recaptured, it is used to refill existing equipment, thereby lowering the amount of SF_6 purchased by utilities for this purpose.

 $^{^{108}}$ Ideally, sales to utilities in the United States between 1990 and 1999 would be used as a model. However, this information was not available. There were only two U.S. manufacturers of SF₆ during this time period, so it would not have been possible to conceal sensitive sales information by aggregation.

¹⁰⁹ Nameplate capacity is defined as the amount of SF₆ within fully charged electrical equipment.

Gas purchases by utilities and equipment manufacturers from 1961 through 2003 are available from the RAND (2004) survey. To estimate the quantity of SF₆ released or recovered from retiring equipment, the nameplate capacity of retiring equipment in a given year was assumed to equal 81.2 percent of the amount of gas purchased by electrical equipment manufacturers 40 years previous (e.g., in 2000, the nameplate capacity of retiring equipment was assumed to equal 81.2 percent of the gas purchased in 1960). The remaining 18.8 percent was assumed to have been emitted at the time of manufacture. The 18.8 percent emission factor is an average of IPCC default SF₆ emission rates for Europe and Japan for 1995 (IPCC 2006). The 40-year lifetime for electrical equipment is also based on IPCC (2006). The results of the two components of the above equation were then summed to yield estimates of global SF₆ emissions from 1990 through 1999.

U.S. emissions between 1990 and 1999 are assumed to follow the same trajectory as global emissions during this period. To estimate U.S. emissions, global emissions for each year from 1990 through 1998 were divided by the estimated global emissions from 1999. The result was a time series of factors that express each year's global emissions as a multiple of 1999 global emissions. Historical U.S. emissions were estimated by multiplying the factor for each respective year by the estimated U.S. emissions of SF₆ from electric power systems in 1999 (estimated to be 14.0 MMT CO₂ Eq.).

Two factors may affect the relationship between the RAND sales trends and actual global emission trends. One is utilities' inventories of SF₆ in storage containers. When SF₆ prices rise, utilities are likely to deplete internal inventories before purchasing new SF₆ at the higher price, in which case SF₆ sales will fall more quickly than emissions. On the other hand, when SF₆ prices fall, utilities are likely to purchase more SF₆ to rebuild inventories, in which case sales will rise more quickly than emissions. This effect was accounted for by applying 3-year smoothing to utility SF₆ sales data. The other factor that may affect the relationship between the RAND sales trends and actual global emissions is the level of imports from and exports to Russia and China. SF₆ production in these countries is not included in the RAND survey and is not accounted for in any another manner by RAND. However, atmospheric studies confirm that the downward trend in estimated global emissions between 1995 and 1998 was real (see the Uncertainty discussion below).

1999 through 2021 Emissions from Electric Power Systems

Emissions from electric power systems from 1999 to 2021 were estimated based on: (1) reporting from utilities participating in EPA's SF₆ Emission Reduction Partnership for Electric Power Systems (Partners), which began in 1999; (2) reporting from utilities covered by EPA's GHGRP, which began in 2012 for emissions occurring in 2011 (GHGRP-Only Reporters); and (3) the relationship between utilities' reported emissions and their transmission miles as reported in the 2001, 2004, 2007, 2010, 2013, and 2016 Utility Data Institute (UDI) Directories of Electric Power Producers and Distributors (UDI 2001, 2004, 2007, 2010, 2013, and 2017), and 2019, 2020, and 2021 Homeland Infrastructure Foundation-Level Data (HIFLD) (HIFLD 2019, 2020, and 2021), which was applied to the electric power systems that do not report to EPA (Non-Reporters). Total U.S. transmission mileage was interpolated between 2016 and 2019 to estimate transmission mileage of electric power systems in 2017 and 2018. (Transmission miles are defined as the miles of lines carrying voltages above 34.5 kV).

Partners

Over the period from 1999 to 2021, Partner utilities, which for inventory purposes are defined as utilities that either currently are or previously have been part of the Partnership, 110 represented 49 percent, on average, of total U.S. transmission miles. Partner utilities estimated their emissions using a Tier 3 utility-level mass balance approach (IPCC 2006). If a Partner utility did not provide data for a particular year, emissions were interpolated between years for which data were available or extrapolated based on Partner-specific transmission mile growth

¹¹⁰ Starting in the 1990 to 2015 Inventory, partners who had reported three years or less of data prior to 2006 were removed. Most of these Partners had been removed from the list of current Partners but remained in the Inventory due to the extrapolation methodology for non-reporting partners.

rates. In 2012, many Partners began reporting their emissions (for 2011 and later years) through EPA's GHGRP (discussed further below) rather than through the Partnership. In 2021, less than 1 percent of the total emissions attributed to Partner utilities were reported through Partnership reports. Approximately 99.7 percent of the total emissions attributed to Partner utilities were reported and verified through EPA's GHGRP. ¹¹¹ Overall, the emission rates reported by Partners have decreased significantly throughout the time series.

Non-Partners

Non-Partners consist of two groups: Utilities that have reported to the GHGRP beginning in 2012 (reporting 2011 emissions) or later years (GHGRP-only Reporters) and utilities that have never reported to the GHGRP (Non-Reporters). EPA's GHGRP requires users of SF₆ in electric power systems to report emissions if the facility has a total SF₆ nameplate capacity that exceeds 17,820 pounds. (This quantity is the nameplate capacity that would result in annual SF₆ emissions equal to 25,000 metric tons of CO_2 equivalent at the historical emission rate reported under the Partnership.) As under the Partnership, electric power systems that report their SF₆ emissions under EPA's GHGRP are required to use the Tier 3 utility-level mass-balance approach. GHGRP-Only Reporters accounted for 16 percent of U.S. transmission miles and 13 percent of estimated U.S. emissions from electric power system in 2021.

From 1999 through 2010, emissions from both GHGRP-only Reporters and Non-Reporters were estimated in the same way. From 1999 through 2008, emissions were estimated using the results of a regression analysis that correlated the 1999 emissions from Partner utilities with their 1999 transmission miles. ¹¹³ The 1999 regression coefficient (emission factor) was held constant through 2008 and multiplied by the transmission miles estimated for the non-Partners for each year.

The 1999 regression equation for Non-Partners was developed based on the emissions reported by a subset of Partner utilities who reported non-zero emissions and non-zero transmission miles (representing approximately 50 percent of total U.S. transmission miles). The regression equation for 1999 is displayed in the equation below.

Equation 4-24: Regression Equation for Estimating SF₆ Emissions of Non-Reporting Facilities in 1999

Emissions (kg) = 0.771 × Transmission Miles

For reasons discussed further below in the Recalculations section, the emission factor for the non-Partners was assumed to decrease beginning in 2009, trending toward the regression coefficient (emission factor) calculated for the GHGRP-only reporters based on their reported 2011 emissions and transmission miles. Emission factors for 2009 and 2010 were linearly interpolated between the 1999 and 2011 emission factors. For 2009, the emissions of non-Partners were estimated by multiplying their transmission miles by the interpolated 2009 emission factor (0.65 kg/transmission mile).

¹¹¹ Only data reported as of August 12, 2022 are used in the emission estimates for the prior year of reporting. Emissions for Partners that did not report to the Partnership or GHGRP are extrapolated for three years using a utility-specific transmission mile growth rate. After four consecutive years of non-reporting they are included in the 'non-reporting Partners' category. It should be noted that data reported through EPA's GHGRP must go through a verification process. For electric power systems, verification involved a series of electronic range, completeness, and algorithm checks for each report submitted.

¹¹² GHGRP-reported and Partner transmission miles from a number of facilities were equal to zero with non-zero emissions. These facilities emissions were added to the emissions totals for their respective parent companies when identifiable and not included in the regression equation when not identifiable or applicable. Other facilities reported non-zero transmission miles with zero emissions, or zero transmission miles and zero emissions. These facilities were not included in the development of the regression equations (discussed further below). These emissions are already implicitly accounted for in the relationship between transmission miles and emissions.

 $^{^{113}}$ In the United States, SF₆ is contained primarily in transmission equipment rated above 34.5 kV.

The 2011 regression equation was developed based on the emissions reported by GHGRP-Only Reporters who reported non-zero emissions and non-zero transmission miles (representing approximately 23 percent of total U.S. transmission miles). The regression equation for 2011 is displayed below.

Equation 4-25: Regression Equation for Estimating SF₆ Emissions of GHGRP-Only Reporters in 2011

Emissions (kg) = $0.397 \times Transmission Miles$

For 2011 and later years, the emissions of GHGRP-only reporters were generally equated to their reported emissions, unless they did not report. The emissions of GHGRP-only reporters that have years of non-reporting between reporting years are gap filled by interpolating between reported values.

For 2010 and later years, the emissions of non-Reporters were estimated by multiplying their transmission miles by the estimated 2010 emission factor (0.52 kg/transmission mile), which was held constant from 2010 through 2021.

Off-ramping GHGRP Facilities

The GHGRP program has an "off-ramp" provision (40 CFR Part 98.2(i)) that exempts facilities from reporting under certain conditions. If reported total greenhouse gas emissions are below 15,000 metric tons of carbon dioxide equivalent (MT CO_2 Eq.) for three consecutive years or below 25,000 MT CO_2 Eq. for five consecutive years, the facility may elect to discontinue reporting. Emissions of GHGRP reporters that have off-ramped are extrapolated for three years of non-reporting using a utility-specific transmission mile growth rate. After three consecutive years of non-reporting, emissions for facilities that off-ramped from GHGRP were estimated using an emissions rate derived from the reported emissions and transmission miles of GHGRP-only reporters in the respective year.

Table 4-119: GHGRP-only Average Emission Rate (kg per mile)

	2011	2017	2018	2019	2020	2021
Average emission rate	0.40	0.24	0.22	0.28	0.26	0.25

Table 4-120: Categorization of Utilities and Timeseries for Application of Corresponding Emission Estimation Methodologies

Categorization of Utilities	Timeseries
Partners	1999 - 2021
Non-Partners (GHGRP-Only)	2011 – 2021
Non-Partners (Remaining Non-	
Reporting Utilities)	1999 – 2021
Off-ramping GHGRP Facilities	2017 – 2021

Total Industry Emissions

As a final step, total electric power system emissions from 1999 through 2021 were determined for each year by summing the Partner reported and estimated emissions (reported data was available through the EPA's SF_6 Emission Reduction Partnership for Electric Power Systems), the GHGRP-only reported emissions, off-ramping GHGRP Facilities (non-reporters), non-reporters who eventually report to GHGRP, and the non-reporting utilities' emissions.

Non-Partner Transmission Miles

Data on transmission miles for each Non-Reporter for the years 2000, 2003, 2006, and 2009, 2012, and 2016 were obtained from the 2001, 2004, 2007, 2010, 2013, and 2017 UDI Directories of Electric Power Producers and Distributors, respectively (UDI 2001, 2004, 2007, 2010, 2013, and 2017). For 2019, 2020, and 2021 non-reporter transmission mileage was derived by subtracting reported transmission mileage data from the total U.S. transmission mileage from 2019, 2020, and 2021 HIFLD Data (HIFLD 2019, 2020, and 2021). The following trends in transmission miles have been observed over the time series:

- The U.S. transmission system grew by over 22,000 miles between 2000 and 2003 yet declined by almost 4,000 miles between 2003 and 2006. Given these fluctuations, periodic increases are assumed to occur gradually. Therefore, transmission mileage was assumed to increase at an annual rate of 1.2 percent between 2000 and 2003 and decrease by 0.20 percent between 2003 and 2006.
- The U.S. transmission system's annual growth rate grew to 1.7 percent from 2006 to 2009 as transmission miles increased by more than 33,000 miles.
- The annual growth rate for 2009 through 2012 was calculated to be 1.5 percent as transmission miles grew yet again by over 30,000 miles during this time period.
- The annual transmission mile growth rate for 2012 through 2016 was calculated to be 0.4 percent, as transmission miles increased by approximately 10,250 miles.
- The annual transmission mile growth rate for 2016 through 2020 was calculated to be 0.7 percent, as transmission miles increased by approximately 20,300 miles.
- The annual transmission mile growth rate for 2020 through 2021 was calculated to be 2.2 percent, as transmission miles increased by approximately 16,152 miles.

Transmission miles for each year for non-reporters were calculated by interpolating between UDI reported values obtained from the 2001, 2004, 2007, 2010, 2013 and 2017 UDI directories and 2019 HIFLD data. In cases where a non-reporter previously reported the GHGRP or the Partnership, transmission miles were interpolated between the most recently reported value and the next available UDI value.

1990 through 2021 Emissions from Manufacture of Electrical Equipment

Three different methods were used to estimate 1990 to 2021 emissions from original electrical equipment manufacturers (OEMs).

- OEM SF₆ emissions from 1990 through 2000 were derived by assuming that manufacturing emissions equaled 10 percent of the quantity of SF₆ provided with new equipment. The 10 percent emission rate is the average of the "ideal" and "realistic" manufacturing emission rates (4 percent and 17 percent, respectively) identified in a paper prepared under the auspices of the International Council on Large Electric Systems (CIGRE) in February 2002 (O'Connell et al. 2002). The quantity of SF₆ provided with new equipment was estimated based on statistics compiled by the National Electrical Manufacturers Association (NEMA). These statistics were provided for 1990 to 2000.
- OEM SF₆ emissions from 2000 through 2010 were estimated by (1) interpolating between the emission rate estimated for 2000 (10 percent) and an emission rate estimated for 2011 based on reporting by OEMs through the GHGRP (5.7 percent), and (2) estimating the quantities of SF₆ provided with new equipment for 2001 to 2010. The quantities of SF₆ provided with new equipment were estimated using Partner reported data and the total industry SF₆ nameplate capacity estimate (156.5 MMT CO₂ Eq. in 2010). Specifically, the ratio of new nameplate capacity to total nameplate capacity of a subset of Partners for which new nameplate capacity data was available from 1999 to 2010 was calculated. These ratios were then multiplied by the total industry nameplate capacity estimate for each year to derive the amount of SF₆ provided with new equipment for the entire industry. Additionally, to obtain the 2011 emission rate (necessary for estimating 2001 through 2010 emissions), the estimated 2011 emissions (estimated using the third methodology listed below) were divided by the estimated total quantity of SF₆ provided with new equipment in 2011. The 2011 quantity of SF₆ provided with new equipment was estimated in the same way as the 2001 through 2010 quantities.
- OEM CF₄ emissions from 1991 through 2010 were estimated by using an average ratio of reported SF₆ and CF₄ emissions from 2011 through 2013. This ratio was applied to the estimated SF₆ emissions for 1991 through 2010 to arrive at CF₄ emissions. CF₄ emissions are estimated starting in 1991 and assumed zero prior to 1991 based on the entry of the CF₄/SF₆ gas mixture into the market (Middleton 2000).

- OEM emissions from 2011 through 2021 were estimated using the SF₆ and CF₄ emissions from OEMs reporting to the GHGRP, and an assumption that these reported emissions account for a conservatively low estimate of 50 percent of the total emissions from all U.S. OEMs (those that report and those that do not).
- OEM SF₆ emissions from facilities off-ramping from the GHGRP were determined by extrapolation. First, emission growth rates were calculated for each reporting year for each OEM reporting facility as well as an average emissions growth rate (2011-to present). Averages of reported emissions from last three consecutive reporting years were multiplied by the average growth rate for each off-ramping OEM to estimate emissions for the non-reporting year(s).

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

To estimate the uncertainty associated with emissions of SF₆ and CF₄ from Electrical Transmission and Distribution, uncertainties associated with four quantities were estimated: (1) emissions from Partners, (2) emissions from GHGRP-Only Reporters, (3) emissions from Non-Reporters, and (4) emissions from manufacturers of electrical equipment. A Monte Carlo analysis was then applied to estimate the overall uncertainty of the emissions estimate.

Total emissions from the SF₆ Emission Reduction Partnership include emissions from both reporting (through the Partnership or EPA's GHGRP) and non-reporting Partners. For reporting Partners, individual Partner-reported SF₆ data was assumed to have an uncertainty of 10 percent. Based on a Monte Carlo analysis, the cumulative uncertainty of all Partner-reported data was estimated to be 6.3 percent. The uncertainty associated with extrapolated or interpolated emissions from non-reporting Partners was assumed to be 20 percent.

For GHGRP-Only Reporters, reported SF₆ data was assumed to have an uncertainty of 10 percent. Based on a Monte Carlo analysis, the cumulative uncertainty of all GHGRP-Only reported data was estimated to be 8.3 percent.

As discussed below, EPA has substantially revised its method for estimating emissions from non-Reporters, assuming that the average emission rate of non-Reporters has declined much more slowly than the average emission rate of reporting facilities rather than declining at the same rate. This assumption brings the U.S. SF₆ emissions estimated in this Inventory into better agreement with the U.S. SF₆ emissions inferred from atmospheric observations. However, it must be emphasized that the actual emission rates of non-Reporters remain unknown. It is possible that they are lower or even higher than estimated here. One possibility is that SF6 sources other than electric power systems are contributing to the emissions inferred from atmospheric observations, implying that the emissions from non-Reporters are lower than estimated here. Another is that the emissions inferred from atmospheric measurements are over- (or under-) estimated, implying that emissions from no-Reporters could be either lower or higher than estimated here. These uncertainties are difficult to quantify and are not reflected in the estimated uncertainty below. The estimated uncertainty below accounts only for the two sources of uncertainty associated with the regression equations used to estimate emissions in 2019 from Non-Reporters: (1) uncertainty in the coefficients (as defined by the regression standard error estimate), and (2) the uncertainty in total transmission miles for Non-Reporters. Uncertainties were also estimated regarding (1) estimates of SF₆ and CF₄ emissions from OEMs reporting to EPA's GHGRP, and (2) the assumption on the percent share of OEM emissions from OEMs reporting to EPA's GHGRP.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 1-57. Electrical Transmission and Distribution SF₆ and CF₄ emissions were estimated to be between 4.6 and 7.4 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of approximately 23 percent below and 24 percent above the emission estimate of 6.0 MMT CO₂ Eq.

Table 4-121: Approach 2 Quantitative Uncertainty Estimates for SF₆ and CF₄ Emissions from **Electrical Transmission and Distribution (MMT CO₂ Eq. and Percent)**

		2021 Emission Estimate	Uncertainty	Range Relative	to 2021 Emissio	n Estimate ^a
Source	Gas	(MMT CO ₂ Eq.)	(MMT CO ₂	Eq.)	(%)	
			Lower	Upper	Lower	Upper
		Bound	Bound	Bound	Bound	
Floatrical Transmission	SF ₆					
Electrical Transmission	and	6.0	4.6	7.4	-23%	+24%
and Distribution	CF ₄					

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

In addition to the uncertainty quantified above for the 2021 estimate, there is uncertainty associated with the emission rates of GHGRP-only facilities before 2011 and of non-Reporters throughout the time series. As noted above in the discussion of the uncertainty of non-Reporters for 2021, these uncertainties are difficult to quantify.

There is also uncertainty associated with using global SF_6 sales data to estimate U.S. emission trends from 1990 through 1999. However, the trend in global emissions implied by sales of SF_6 appears to reflect the trend in global emissions implied by changing SF_6 concentrations in the atmosphere. That is, emissions based on global sales declined by 29 percent between 1995 and 1998 (RAND 2004), and emissions based on atmospheric measurements declined by 17 percent over the same period (Levin et al. 2010).

Several pieces of evidence indicate that U.S. SF_6 emissions were reduced as global emissions were reduced. First, the decreases in sales and emissions coincided with a sharp increase in the price of SF_6 that occurred in the mid-1990s and that affected the United States as well as the rest of the world. A representative from DILO, a major manufacturer of SF_6 recycling equipment, stated that most U.S. utilities began recycling rather than venting SF_6 within two years of the price rise. Finally, the emissions reported by the one U.S. utility that reported its emissions for all the years from 1990 through 1999 under the Partnership showed a downward trend beginning in the mid-1990s.

QA/QC and Verification

Case 5:23-cv-00304-H

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter and Annex 8 for more details. Category specific QC findings are described below.

For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). ¹¹⁴ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

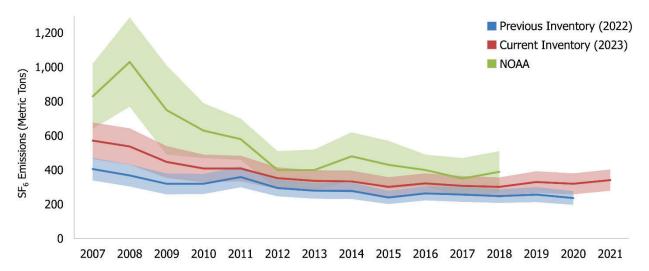
Comparison of Emissions Derived from Atmospheric Measurements to Emissions from Bottom-up Estimates

Emissions of SF₆ have been estimated for the contiguous United States by the National Oceanic and Atmospheric Administration (NOAA) based on atmospheric measurements. To provide additional quality control for the SF₆ emissions estimates presented in this inventory, USEPA and NOAA compared the 2007-2018 emission estimates derived from atmospheric measurements by NOAA to the emission estimates for SF₆-emitting source categories in

¹¹⁴ GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp verification factsheet.pdf.

this inventory, of which electrical transmission and distribution is by far the largest. 115 The 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2019) Volume 1: General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. Further, it identifies fluorinated gases as particularly suited for such comparisons. The 2019 Refinement makes this conclusion for fluorinated gases based on their lack of significant natural sources, 116 their generally long atmospheric lifetimes, their well-known loss mechanisms, and the potential uncertainties in bottom-up inventory methods for some of their sources. Unlike non-fluorinated greenhouse gases (CO₂, CH₄, and N₂O), SF₆ has no significant natural sources; therefore, the SF₆ estimates derived from atmospheric measurements are driven overwhelmingly by anthropogenic emissions. The 2019 Refinement provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC 2019 Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC 2019 Volume 1, Chapter 6). Emission estimates derived from atmospheric measurements of SF₀ made at NOAA and described in Hu et al. (2022) were used in this comparison.

Figure 4-3: U.S. Emissions of SF₆ Comparison^a



^aSources: NOAA data from Hu et al. 2022; EPA 1990-2020 inventory estimates from EPA 2022.

As shown in Figure 4-3, a significant gap existed between the atmosphere-derived emissions for 2007-2018 available in Hu et al., and the inventory estimates for the same years in the previous Inventory, particularly in 2010 and earlier years, before reporting through the GHGRP began. 117 With the revisions in methodology described above and below in the "Recalculations" section, the gap between the atmosphere-derived emissions and the estimates in this Inventory is smaller. Nevertheless, differences remain between the atmosphere-derived

 $^{^{115}}$ Other SF $_{6}$ -emitting source categories included in this inventory include Magnesium Production and Processing and Electronics Manufacturing.

¹¹⁶ See Harnisch and Eisenhauer, 1998.

¹¹⁷ The uncertainties in the NOAA estimates are drawn from Hu et al. (2002). To estimate the 2007-2020 and 2007-2021 uncertainties of EPA's total SF₆ emissions in the previous and current Inventories, the relative uncertainty for each SF₆-emitting category for 2020 or 2021, as applicable, was assumed to apply to the emissions from that source category in all previous years. The relative uncertainty for each source category was then multiplied by the previous Inventory or current Inventory SF₆ emissions estimate for that source category for each year to calculate the absolute uncertainties for each source category for each year in each time series. Finally, these uncertainties were then combined across source categories using Monte Carlo analysis to develop the total uncertainty of SF₆ emissions across the source categories.

emissions and the Inventory estimates, especially before 2011. The EPA is continuing to research potential contributors to this difference. One potential contributor to the difference before 2011 is an SF₆ production plant that operated in Metropolis, Illinois, through 2010, and which is currently unaccounted for in the Inventory. While EPA never received reported emissions from this plant, based on production capacity data from 2006 and the broad range of emission factors observed for production of SF₆ and other fluorinated gases, the plant's SF₆ emissions would likely have ranged between 30 and 300 metric tons yr⁻¹ (Hu et al. 2022). Emissions at the upper end of this range would explain most of the gap in 2007 and 2008, and a tapering down of emissions through 2010 might have been expected as the plant reduced production on its way to shutting down. EPA plans to include estimates of emissions from this plant in a future submission of the Inventory. See Planned Improvements below.

Recalculations Discussion

Based in part on comparisons with atmospheric data, the historical emissions estimated for this source category have undergone major revisions for the period 1990 through 2021, namely for non-Partners. Other, relatively smaller recalculations include an adjustment to OEM SF_6 emissions to address GHGRP off-ramping facilities and a correction to earlier year data for two facilities:

- To determine emissions from OEM facilities that have ceased reporting to the GHGRP as a result of the off-ramping provision, emissions were estimated by multiplying the average of reported emissions from the prior three consecutive years by the average growth rate of SF₆ emissions for all reporting years.
- Significant incongruities were identified and corrected in the reported data for two historical nameplate
 capacities of reporter facilities with one instance in 2011 and the other instance in 2013. In each instance,
 corrections were made by calculating the expected nameplate capacity using data reported by the facility
 in the prior year.

Updates were also made to reporter emissions where facilities had resubmitted data.

Recalculations of Non-Partner Emissions

As discussed above, results of research conducted by the National Oceanic Atmospheric Administration (Hu et al. 2022) reveal that total U.S. emissions of SF₆ were likely significantly higher than previously estimated in the inventory, particularly for the years before 2012, when reporting of emissions from electric power systems began under the GHGRP. In addition, the research indicates that U.S. emissions of SF₆ trended strongly downward from 2008 to 2009, and the downward trend continued through 2012.

In evaluating possible drivers for the difference and the strong downward trend, EPA identified non-Partner utilities as a potentially significant contributor. As discussed above, non-Partner utilities consist of two groups: (1) utilities that were required to report to the GHGRP for the first time in 2012 (GHGRP-only reporters) and (2) utilities that have never been required to the GHGRP because they fall under the reporting threshold (non-reporters). The emission rates of the GHGRP-only facilities before 2011 are not known, and the emission rates of non-reporters are not known for any year of the time series. A simple assumption would be that the emission rates of the non-Partners have been the same as those of the Partners. However, this assumption is uncertain because the Partners and non-Partners are distinct populations whose emission rates may have varied in magnitude, trend, or both. For example, both the Partners and the GHGRP-only reporters have reduced their emission rates over time. The extent to which non-Partners and, for more recent years, non-reporters have also reduced emission rates depends on how much the observed reductions are due to industry-wide trends (such as improved electrical equipment design and materials and greater availability of SF₆ recycling equipment) versus emission reduction efforts that result directly from tracking and reporting emissions (such as improved SF₆ handling practices and equipment refurbishment or replacement campaigns). In general, non-reporting facilities would be expected to show reductions related to industry-wide trends, but not reductions related to tracking and reporting emissions.

EPA has previously revised assumptions regarding the emission rates of non-Partner utilities based on ongoing review and statistical analysis of data from the Partnership and the GHGRP. In U.S. Inventories submitted in 2012 and earlier years, non-Partners were assumed to have the same emission rate per transmission mile as the

Partners (except certain outliers) had in 1999, when the Partnership began. Because Partners significantly decreased their emission rates as the Partnership continued, the assumption that non-Partners continued to emit at the Partners' 1999 rate caused the estimated emission rates for Partners and non-Partners to diverge over time. In 2012, the submittal of the first set of reports (for 2011) by GHGRP-only utilities provided some insight into the emission rates of non-Partner utilities. When the emission rates of Partners and GHGRP-only facilities were compared in 2012, no statistically significant difference was found. Thus, in the U.S. Inventories submitted in 2013 through 2022, EPA assumed that the emission rates per transmission mile of non-reporting utilities (and of GHGRPonly utilities before 2011) were similar to those of Partners (before 2011) and then of GHGRP reporters (in and after 2011). Specifically, non-reporter emissions for 2011 and later years were estimated by multiplying nonreporter transmission miles by regression coefficients derived for reporting facilities for the same year. Nonreporter and GHGRP-only emissions for 1999 through 2006 were estimated by linearly interpolating between the 1999 regression coefficient (based on 1999 Partner data) and 2006 regression coefficient. Non-reporter and GHGRP-only emissions for 2007 through 2010 were estimated by linearly interpolating between the 2006 regression coefficient and the 2011 regression coefficient.

The results of the comparison with the atmosphere-derived emissions suggest that, rather than decreasing in tandem with the emission rates of the Partners from 1999 onward, the emission rates of the non-Partners may have remained high until 2008, decreasing sharply thereafter. In 2008, EPA began to develop the GHGRP, and the final rule establishing the GHGRP scope and reporting requirements for electric power systems was published in 2010. Thus, the trend is consistent with the hypothesis that non-Partner utilities, faced with the possibility of being required to calculate and report their SF₆ emissions, began to take action to understand and reduce those emissions in 2009. Resources for tracking, and to some extent, reducing, emissions were available on EPA's website for the Partnership and elsewhere. The importance of tracking and reporting emissions to emission reduction efforts is supported by analysis of the emissions reported by both Partner and GHGRP-only utilities. Both sets of data show that emissions declined most rapidly during the first three years of reporting (1999-2001 for the Partners; 2011-2013 for the GHGRP-only utilities). In addition, while there was no statistically significant difference (at the 95% confidence level) between the Partner and GHGRP-only facility emission rates in 2011, subsequent analysis of the data shows that the emission rates of the GHGRP-only facilities were, on average, higher than those of the Partners, but that the difference was rapidly narrowed in subsequent years. This is consistent with Partners having already made cost-effective reductions in earlier years that the GHGRP-only facilities implemented as they began reporting.

Given these atmospheric findings, the trends in emission reductions upon initial reporting, and because emissions from non-reporting electric power systems are a significant source of uncertainty in the current U.S. SF₆ inventory, EPA revised the methodology used to estimate non-reporter emissions. To recalculate non-Partner emissions from 1999 through 2010, an updated regression coefficient (emissions as a function of transmission miles) that includes outliers for 1999 was calculated to estimate non-reporter emissions for 1999. In addition, a new regression coefficient was calculated for 2011 that includes GHGRP-only Reporters. New emissions rates (SF6 emissions/ Transmission Miles) were calculated for 1999 and 2011. The 1999 emissions rate was held constant to estimate non-Partner emissions from 2000-2008. Emissions from 2009 to 2010 were based on the interpolated emission rate between 2008 (still held at the 1999 emission rate) and the 2011 emission rate from the GHGRP-only reporters, as discussed above. The interpolated 2010 emission rate was used for estimating non-reporter emissions from 2010 through 2021. As a result of the revision to the methodology used to estimate non-reporter emissions in this inventory, non-reporter SF₆ emissions estimates increased by 94 percent at an average, for years 1999 to 2020, in comparison to the 1999 to 2020 inventory emissions estimates. Non-reporting facilities were assumed to have significantly lowered their emissions rates in anticipation of the GHGRP, but not to have made additional substantial improvements after determining that they were not subject to the rule. Of note, even though the emissions per transmission mile are being held constant for non-reporters, the implied emission rate in terms of emissions per nameplate capacity is still decreasing, although at a slower rate than for reporters, as the average nameplate capacity per transmission mile continues to increase.

As a result of the recalculations, SF_6 emissions from electrical transmission and distribution increased by 50 percent for 2020 relative to the previous report. On average, SF_6 emission estimates for 1999 through 2020 increased by approximately 23 percent per year.

Revision of Global Warming Potentials (GWPs)

In addition to methodological updates discussed above, for the current Inventory, calculated CO_2 -equivalent estimates of SF_6 and CF_4 emissions from electrical transmission and distribution have been updated to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWP values have been applied across the entire time series for consistency. The GWP for SF_6 has increased from 22,800 to 23,500, leading to an overall increase in CO_2 -equivalent SF_6 emissions and the GWP for CF_4 decreased from 7,390, to 6,630, leading to a decrease in CO_2 -equivalent CF_4 emissions. The average annual change in CO_2 equivalent emissions of SF_6 was a 3.07 percent increase and the average annual change in CO_2 -equivalent emissions of CF_4 was a 10.28 percent decrease for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA plans to revisit the methodology for determining emissions from the manufacture of electrical equipment, in particular, the assumption that emissions reported by OEMs account for a conservatively low estimate of 50 percent of the total emissions from all U.S. OEMs. Additional market research will be required to confirm or modify the assumptions regarding the portion of industry not reporting to the GHGRP program. See Annex 5 for more information on EPA's plans to review available data to reflect the emissions from the missing SF_6 production facility and allocate and report those emissions under the appropriate category (i.e., fluorochemical production category) in future Inventories.

4.26 Nitrous Oxide from Product Uses (CRF Source Category 2G3)

Nitrous oxide (N_2O) is a clear, colorless, oxidizing liquefied gas with a slightly sweet odor which is used in a wide variety of specialized product uses and applications. The amount of N_2O that is actually emitted depends upon the specific product use or application.

There are a total of three N_2O production facilities currently operating in the United States (Ottinger 2021). Nitrous oxide is primarily used in carrier gases with oxygen to administer more potent inhalation anesthetics for general anesthesia, and as an anesthetic in various dental and veterinary applications. The second main use of N_2O is as a propellant in pressure and aerosol products, the largest application being pressure-packaged whipped cream. Small quantities of N_2O also are used in the following applications:

- Oxidizing agent and etchant used in semiconductor manufacturing;
- Oxidizing agent used, with acetylene, in atomic absorption spectrometry;
- Production of sodium azide, which is used to inflate airbags;
- Fuel oxidant in auto racing; and
- Oxidizing agent in blowtorches used by jewelers and others (Heydorn 1997).

Production of N₂O in 2021 was approximately 15 kt (see Table 4-122).

Table 4-122: N₂O Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	16	15	15	15	15	15	15

Nitrous oxide emissions were 3.8 MMT CO₂ Eq. (14 kt N₂O) in 2021 (see Table 4-123). Production of N₂O stabilized during the 1990s because medical markets had found other substitutes for anesthetics, and more medical procedures were being performed on an outpatient basis using local anesthetics that do not require N₂O. The use of N₂O as a propellant for whipped cream has also stabilized due to the increased popularity of cream products packaged in reusable plastic tubs (Heydorn 1997).

Table 4-123: N₂O Emissions from N₂O Product Usage (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
N₂O Product Usage	3.8	3.8	3.8	3.8	3.8	3.8	3.8

Table 4-124: N₂O Emissions from N₂O Product Usage (kt N₂O)

Year	1990	2005	2017	2018	2019	2020	2021
N ₂ O Product Usage	14	14	14	14	14	14	14

Methodology and Time-Series Consistency

Emissions from N₂O Product Uses were estimated using the following equation:

Equation 4-26: N₂O Emissions from Product Use

$$E_{pu} = \sum_{a} (P \times S_a \times ER_a)$$

where,

 E_{pu} = N_2O emissions from product uses, metric tons

P = Total U.S. production of N_2O , metric tons

a = specific application

 S_a = Share of N_2O usage by application a

 ER_a = Emission rate for application a, percent

The share of total quantity of N_2O usage by end-use represents the share of national N_2O produced that is used by the specific subcategory (e.g., anesthesia, food processing). In 2020, the medical/dental industry used an estimated 89.5 percent of total N_2O produced, followed by food processing propellants at 6.5 percent. All other subcategories, including semiconductor manufacturing, atomic absorption spectrometry, sodium azide production, auto racing, and blowtorches, used the remainder of the N_2O produced. This subcategory breakdown changed slightly in the mid-1990s. For instance, the small share of N_2O usage in the production of sodium azide declined significantly during the 1990s. Due to the lack of information on the specific time period of the phase-out in this market subcategory, most of the N_2O usage for sodium azide production is assumed to have ceased after 1996, with the majority of its small share of the market assigned to the larger medical/dental consumption subcategory (Heydorn 1997). For 1990 through 1996, N_2O usage was allocated across the following subcategories: medical applications, food processing propellant, and sodium azide production. A usage emissions rate was then applied for each subcategory to estimate the amount of N_2O emitted.

Only the medical/dental and food propellant subcategories were assumed to release emissions into the atmosphere that are not captured under another source category, and therefore these subcategories were the only usage subcategories with emission rates. Emissions of N_2O from semiconductor manufacturing are described

in Section 4.23 Electronics Industry (CRF Source Category 2E) and reported under CRF Source Category 2H3. For the medical/dental subcategory, due to the poor solubility of N_2O in blood and other tissues, none of the N_2O is assumed to be metabolized during anesthesia and quickly leaves the body in exhaled breath. Therefore, an emission factor of 100 percent was used for this subcategory (IPCC 2006). For N_2O used as a propellant in pressurized and aerosol food products, none of the N_2O is reacted during the process and all of the N_2O is emitted to the atmosphere, resulting in an emission factor of 100 percent for this subcategory (IPCC 2006). For the remaining subcategories, all of the N_2O is consumed or reacted during the process, and therefore the emission rate was considered to be zero percent (Tupman 2002).

The 1990 through 1992 N₂O production data were obtained from SRI Consulting's *Nitrous Oxide, North America* (Heydorn 1997). Nitrous oxide production data for 1993 through 1995 were not available. Production data for 1996 was specified as a range in two data sources (Heydorn 1997; Tupman 2002). In particular, for 1996, Heydorn (1997) estimates N₂O production to range between 13.6 and 18.1 thousand metric tons. Tupman (2002) provided a narrower range (15.9 to 18.1 thousand metric tons) for 1996 that falls within the production bounds described by Heydorn (1997). Tupman (2002) data are considered more industry-specific and current; therefore, the midpoint of the narrower production range was used to estimate N₂O emissions for years 1993 through 2001 (Tupman 2002). The 2002 and 2003 N₂O production data were obtained from the Compressed Gas Association Nitrous Oxide Fact Sheet and Nitrous Oxide Abuse Hotline (CGA 2002, 2003). These data were also provided as a range. For example, in 2003, CGA (2003) estimates N₂O production to range between 13.6 and 15.9 thousand metric tons. Due to the lack of publicly available data, production estimates for years 2004 through 2021 were held constant at the 2003 value.

The 1996 share of the total quantity of N_2O used by each subcategory was obtained from SRI Consulting's *Nitrous Oxide, North America* (Heydorn 1997). The 1990 through 1995 share of total quantity of N_2O used by each subcategory was kept the same as the 1996 number provided by SRI Consulting. The 1997 through 2001 share of total quantity of N_2O usage by sector was obtained from communication with a N_2O industry expert (Tupman 2002). The 2002 and 2003 share of total quantity of N_2O usage by sector was obtained from CGA (2002, 2003). Due to the lack of publicly available data, the share of total quantity of N_2O usage data for years 2004 through 2021 was assumed to equal the 2003 value. The emission factor for the food processing propellant industry was obtained from SRI Consulting's *Nitrous Oxide, North America* (Heydorn 1997) and confirmed by a N_2O industry expert (Tupman 2002). The emission factor for the medical/dental subcategory was obtained from the *2006 IPCC Guidelines*.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The overall uncertainty associated with the 2021 N_2O emission estimate from N_2O product usage was calculated using the 2006 IPCC Guidelines (2006) Approach 2 methodology. Uncertainty associated with the parameters used to estimate N_2O emissions include production data, total market share of each end use, and the emission factors applied to each end use, respectively. The uncertainty associated with N_2O production data is ± 25 percent, based on expert judgment. The uncertainty associated with the market share for the medical/dental subcategory is ± 0.56 percent, and uncertainty for the market share of food propellant subcategory is ± 25 percent, both based on expert judgment. Uncertainty for emission factors was assumed to be zero, and using this suggested uncertainty provided in the 2006 IPCC Guidelines is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-125. Nitrous oxide emissions from N_2O product usage were estimated to be between 2.9 and 4.6 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 24 percent below to 24 percent above the emission estimate of 3.8 MMT CO_2 Eq.

Table 4-125: Approach 2 Quantitative Uncertainty Estimates for N₂O Emissions from N₂O Product Usage (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	1 Emission Estimate Uncertainty Range Relative to Emis					
		(MMT CO ₂ Eq.)	(MMT (CO ₂ Eq.)	q.) (%) Upper Lower	6)		
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
N ₂ O from Product Uses	N ₂ O	3.8	2.9	4.6	-24%	+24%		

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the 2006 IPCC Guidelines, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Recalculations Discussion

For the current Inventory, CO_2 -equivalent estimates of total N_2O emissions from N_2O Product Uses have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N_2O decreased from 298 to 265, leading to an overall decrease in estimates for calculated CO_2 -equivalent N_2O emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual calculated CO_2 -equivalent N_2O emissions decreased by 11 percent each year, ranging from a decrease of 430 kt CO_2 Eq. in 1992 to 519 kt CO_2 Eq. for 1997 through 2001. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA recently initiated an evaluation of alternative production statistics for cross-verification and updating timeseries activity data, emission factors, assumptions, etc., and a reassessment of N_2O product use subcategories that accurately represent trends. This evaluation includes conducting a literature review of publications and research that may provide additional details on the industry. This work remains ongoing, and thus far no additional sources of data have been found to update this category.

Pending additional resources and planned improvement prioritization, EPA may also evaluate production and use cycles, and the potential need to incorporate a time lag between production and ultimate product use and resulting release of N_2O . Additionally, planned improvements include considering imports and exports of N_2O for product uses.

Finally, for future Inventories, EPA will examine data from EPA's GHGRP to improve the emission estimates for the N_2O product use subcategory. Particular attention will be made to ensure aggregated information can be published without disclosing CBI and time-series consistency, as the facility-level reporting data from EPA's GHGRP are not available for all inventory years as required in this Inventory. This is a lower priority improvement, and EPA is still assessing the possibility of incorporating aggregated GHGRP CBI data to estimate emissions; therefore, this planned improvement is still in development and not incorporated in the current Inventory report.

4.27 Industrial Processes and Product Use Sources of Precursor Gases

In addition to the main greenhouse gases addressed above, many industrial processes can result in emissions of various greenhouse gas precursors. The reporting requirements of the UNFCCC 118 request that information should be provided on precursor emissions, which include carbon monoxide (CO), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), and sulfur dioxide (SO₂). These gases are not direct greenhouse gases, but indirectly impact Earth's radiative balance by altering the concentrations of greenhouse gases (e.g., ozone) and atmospheric aerosol (e.g., particulate sulfate). Combustion byproducts such as CO and NO_x are emitted from industrial applications that employ thermal incineration as a control technology. NMVOCs, commonly referred to as "hydrocarbons," are the primary gases emitted from most processes employing organic or petroleum-based products, and can also result from the product storage and handling.

Accidental releases of precursors associated with product use and handling can constitute major emissions in this category. In the United States, emissions from product use are primarily the result of solvent evaporation, whereby the lighter hydrocarbon molecules in the solvents escape into the atmosphere. The major categories of product uses include: degreasing, graphic arts, surface coating, other industrial uses of solvents (e.g., electronics), dry cleaning, and non-industrial uses (e.g., uses of paint thinner). Product usage in the United States also results in the emission of hydrofluorocarbons (HFCs) and small amounts of hydrofluoroethers (HFEs), which are included under Substitution of Ozone Depleting Substances and the Electronics Industry in this chapter.

Total emissions of NO_x , CO, NMVOCs, and SO_2 from non-energy industrial processes and product use from 1990 to 2021 are reported in Table 4-126.

Table 4-126: NO_x, CO, NMVOC, and SO₂ Emissions from Industrial Processes and Product Use (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
NO _x	517	429	312	314	304	274	275
Mineral Industry	160	200	114	118	114	101	101
Other Industrial Processes ^a	69	91	73	72	70	68	69
Metal Industry	96	58	66	63	60	52	52
Chemical Industry	192	80	60	61	59	54	54
СО	3,783	1,417	854	876	864	739	739
Metal Industry	2,261	707	432	447	448	340	340
Other Industrial Processes ^a	248	378	185	186	184	177	177
Mineral Industry	182	120	110	111	106	96	96
Chemical Industry	1,093	211	126	132	126	125	125
NMVOCs	6,733	3,418	2,960	2,943	2,814	3,191	3,191
Other Industrial Processes ^a	6,021	3,147	2,849	2,827	2,700	3,087	3,087
Chemical Industry	601	221	85	88	86	81	81
Mineral Industry	9	10	6	7	7	6	6
Metal Industry	102	40	20	21	20	17	17
SO ₂	1,112	577	228	213	195	164	164
Other Industrial Processes ^a	97	57	23	23	19	19	19
Chemical Industry	283	242	111	106	97	83	83
Mineral Industry	166	138	24	25	25	26	26
Metal Industry	566	140	69	58	53	37	37

⁺ Does not exceed 0.5 kt.

¹¹⁸ See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

^a Other Industrial Processes includes storage and transport, other industrial processes (manufacturing of agriculture, food, and kindred products; wood, pulp, paper, and publishing products; rubber and miscellaneous plastic products; machinery products; construction; transportation equipment; and textiles, leather, and apparel products), and miscellaneous sources (catastrophic/accidental release, other combustion (structural fires), health services, repair shops, and fugitive dust). It does not include agricultural fires or slash/prescribed burning, which are accounted for under the Field Burning of Agricultural Residues source.

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Emission estimates for 1990 through 2020 were obtained from data published on the National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data website (EPA 2023a). For Table 4-126, NEI reported emissions of CO, NO_x, SO₂, and NMVOCs were recategorized from NEI Emissions Inventory System (EIS) sectors to source categories more closely aligned with UNFCCC reporting sectors based on discussions between the EPA GHG Inventory and NEI staff (see crosswalk documented in Annex 6.3). ¹¹⁹ EIS sectors mapped to the IPPU sector categories in this report include: chemical and allied product manufacturing, metals processing, storage and transport, solvent utilization, other industrial processes, and miscellaneous sources. As described in the NEI Technical Support Documentation (TSD) (EPA 2023b), NEI emissions are estimated through a combination of emissions data submitted directly to the EPA by state, local, and tribal air agencies, as well as additional information added by the Agency from EPA emissions programs, such as the emission trading program, Toxics Release Inventory (TRI), and data collected during rule development or compliance testing.

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021, which are described in detail in the NEI's TSD and on EPA's Air Pollutant Emission Trends web site (EPA 2023a; EPA 2023b). A quantitative uncertainty analysis was not performed.

¹¹⁹ The NEI estimates and reports emissions from six criteria air pollutants (CAPs) and 187 hazardous air pollutants (HAPs) in support of National Ambient Air Quality Standards. EPA reported CAP emission trends are grouped into 60 sectors and 15 Tier 1 source categories, which broadly cover similar source categories to those presented in this chapter. For reporting precursor emissions in the common reporting format (CRF), EPA has mapped and regrouped emissions of greenhouse gas precursors (CO,

 NO_x , SO_2 , and NMVOCs) from NEI's EIS sectors to better align with NIR source categories, and to ensure consistency and completeness to the extent possible. See Annex 6.3 for more information on this mapping.

Agriculture 5.

Agricultural activities contribute directly to emissions of greenhouse gases through a variety of processes. This chapter provides an assessment of methane (CH₄) from enteric fermentation, livestock manure management, rice cultivation and field burning of agricultural residues; nitrous oxide (N2O) emissions from agricultural soil management, livestock manure management, and field burning of agricultural residues; as well as carbon dioxide (CO₂) emissions from liming and urea fertilization (see Figure 5-1). Additional CO₂, CH₄ and N₂O fluxes from agriculture-related land-use and land-use conversion activities, such as cultivation of cropland, management on grasslands, grassland fires, aquaculture, and conversion of forest land to cropland, are presented in the Land Use, Land-Use Change, and Forestry (LULUCF) chapter. Carbon dioxide emissions from stationary and mobile on-farm energy use and CH₄ and N₂O emissions from stationary on-farm energy use are reported in the Energy chapter under the Industrial sector emissions. Methane and N₂O emissions from mobile on-farm energy use are reported in the Energy chapter under mobile fossil fuel combustion emissions.

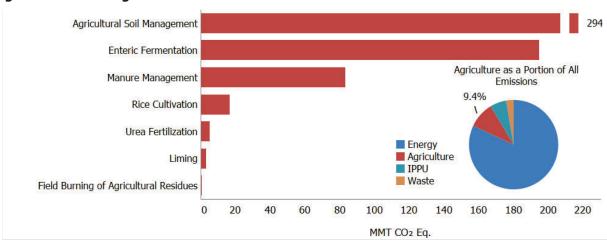


Figure 5-1: 2021 Agriculture Sector Greenhouse Gas Emission Sources

In 2021, the Agriculture sector was responsible for emissions of 598.1 MMT CO_2 Eq., ¹ or 9.4 percent of total U.S. greenhouse gas emissions. Emissions of N2O by agricultural soil management through activities such as fertilizer application and other agricultural practices that increased nitrogen availability in the soil was the largest source of

¹ Following the current reporting requirements under the United Nations Framework Convention on Climate Change (UNFCCC), this Inventory report presents CO₂ equivalent values based on the IPCC Fifth Assessment Report (AR5) GWP values. See the Introduction chapter as well as Chapter 9 for more information.

U.S. N_2O emissions, accounting for 74.8 percent, and the largest source of emissions from the Agriculture sector, accounting for 49.2 percent of total sector emissions. Methane emissions from enteric fermentation and manure management represent 26.8 percent and 9.1 percent of total CH_4 emissions from anthropogenic activities, respectively, and 32.6 and 11.0 percent of Agriculture sector emissions, respectively. Of all domestic animal types, beef and dairy cattle were the largest emitters of CH_4 . Rice cultivation and field burning of agricultural residues were minor sources of CH_4 . Manure management and field burning of agricultural residues were also small sources of N_2O emissions. Urea fertilization and liming accounted for 0.1 percent and 0.06 percent of total CO_2 emissions from anthropogenic activities, respectively.

Table 5-1 and Table 5-2 present emission estimates for the Agriculture sector. Between 1990 and 2021, CO_2 and CH_4 emissions from agricultural activities increased by 16.2 percent and 15.7 percent, respectively, while N_2O emissions from agricultural activities fluctuated from year to year but increased by 3.7 percent overall. Trends in sources of agricultural emissions over the 1990 to 2021 time series are shown in Figure 5-2.

■ Field Burning of Agricultural Residues ■ Manure Management 700 ■ Urea Fertilization ■ Enteric Fermentation Limina Agricultural Soil Management 650 ■ Rice Cultivation 614 600 578 577 572 577 567 550 500 450 400 MMT CO₂ 350 300 250 200 150 100 50 1999 2000 2001 2002 2003 2004 2006 2007 2008 2010 2011 2012 2013 2014 2015 2015

Figure 5-2: Trends in Agriculture Sector Greenhouse Gas Emission Sources

Each year, some emission estimates in the Agriculture sector of the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 through 2020) to ensure that the trend is accurate. This year's notable updates include: Agricultural Soil Management: a) incorporating the most recently released cropping and land use history data from the National Resources Inventory (NRI), b) incorporating remote sensing data regarding tillage practices collected through OpTIS, c) incorporating updated cropland management data from the U.S. Department of Agriculture Conservation Effects and Assessment Project (USDA-CEAP2) into the DayCent model, d) modifying the statistical imputation method for the management activity data associated with tillage practices, mineral fertilization, manure amendments, cover crop management, planting and harvest dates using gradient boosting instead of an artificial neural network, e) constraining synthetic N fertilization and manure N applications in the Tier 3 method at the state scale rather than the national scale, and f) re-calibrating the soil C module in the DayCent model using Bayesian method. For more

information on specific methodological updates, please see the Recalculations discussions within the respective source category sections of this chapter. In addition, for the current Inventory, CO₂-equivalent emissions totals of CH₄ and N₂O have been updated to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements. In total, the methodological and historic data improvements made to the Agriculture sector in this Inventory increased greenhouse gas emissions by an average of 10.9 MMT CO₂ Eq. (1.9 percent) across the time series excluding the impacts of the AR5 GWP change. When including the impacts of the change to AR5 GWP values, Agriculture sector emissions increased 1.9 MMT CO₂ Eq. (0.3 percent) across the time series.

Emissions reported in the Agriculture chapter include those from all states; however, for Hawaii and Alaska some agricultural practices that can increase nitrogen availability in the soil, and thus cause N₂O emissions, are not included (see chapter sections on "Uncertainty and Time-Series Consistency" and "Planned Improvements" for more details). Emissions from the Agriculture sector occurring in U.S. Territories and the District of Columbia are not estimated due to incomplete data, with the exception of urea fertilization in Puerto Rico. EPA continues to identify and review available data on an ongoing basis to include agriculture emissions from U.S. Territories, to the extent they are occurring, in future Inventories. Other minor outlying U.S. Territories in the Pacific Islands have no permanent populations (e.g., Baker Island) and therefore EPA assumes no agricultural activities are occurring. See Annex 5 for more information on EPA's assessment of the sources not included in this Inventory.

Table 5-1: Emissions from Agriculture (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	7.1	7.9	7.9	7.2	7.2	8.0	8.3
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
CH ₄	240.4	263.7	277.5	281.2	280.4	281.0	278.2
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Manure Management	39.0	54.9	64.4	66.5	65.7	66.7	66.0
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Field Burning of Agricultural Residues	0.4	0.5	0.5	0.5	0.5	0.5	0.5
N ₂ O	300.5	306.1	327.7	341.1	326.9	308.2	311.6
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Manure Management	12.4	14.5	16.9	17.2	17.4	17.5	17.4
Field Burning of Agricultural Residues	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Total	548.0	577.7	613.1	629.5	614.5	597.3	598.1

Note: Totals may not sum due to independent rounding.

Table 5-2: Emissions from Agriculture (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO ₂	7,106	7,856	7,931	7,178	7,234	8,037	8,260
Urea Fertilization	2,417	3,504	4,862	4,939	5,030	5,122	5,214
Liming	4,690	4,351	3,069	2,240	2,203	2,915	3,047
CH ₄	8,587	9,419	9,911	10,043	10,013	10,036	9,937
Enteric Fermentation	6,539	6,722	6,998	7,028	7,046	7,007	6,962
Manure Management	1,394	1,960	2,300	2,375	2,348	2,383	2,358
Rice Cultivation	640	720	596	623	602	630	600
Field Burning of Agricultural Residues	15	17	17	17	17	17	17
N ₂ O	1,134	1,155	1,236	1,287	1,233	1,163	1,176
Agricultural Soil Management	1,087	1,100	1,172	1,222	1,167	1,096	1,110
Manure Management	47	55	64	65	65	66	66
Field Burning of Agricultural Residues	1	1	1	1	1	1	1

Note: Totals by gas may not sum due to independent rounding.

Box 5-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines). Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions provided in the Agriculture chapter do not preclude alternative examinations, but rather, this chapter presents emissions in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follow this standardized format and provide an explanation of the application of methods used to calculate emissions from agricultural activities.

5.1 Enteric Fermentation (CRF Source Category 3A)

Methane is produced as part of normal digestive processes in animals. During digestion, microbes resident in an animal's digestive system ferment food consumed by the animal. This microbial fermentation process, referred to as enteric fermentation, produces CH₄ as a byproduct, which can be exhaled or eructated by the animal. The amount of CH₄ produced and emitted by an individual animal depends primarily upon the animal's digestive system, and the amount and type of feed it consumes.²

Ruminant animals (e.g., cattle, buffalo, sheep, goats, and camels) are the major emitters of CH₄ because of their unique digestive system. Ruminants possess a rumen, or large "fore-stomach," in which microbial fermentation breaks down the feed they consume into products that can be absorbed and metabolized. The microbial fermentation that occurs in the rumen enables them to digest coarse plant material that non-ruminant animals cannot. Ruminant animals, consequently, have the highest CH₄ emissions per unit of body mass among all animal types.

Non-ruminant animals (e.g., swine, horses, and mules and asses) also produce CH₄ emissions through enteric fermentation, although this microbial fermentation occurs in the large intestine. These non-ruminants emit significantly less CH₄ on a per-animal-mass basis than ruminants because the capacity of the large intestine to produce CH₄ is lower.

In addition to the type of digestive system, an animal's feed quality and feed intake also affect CH₄ emissions. In general, lower feed quality and/or higher feed intake leads to higher CH₄ emissions. Feed intake is positively correlated to animal size, growth rate, level of activity and production (e.g., milk production, wool growth, pregnancy, or work). Therefore, feed intake varies among animal types as well as among different management practices for individual animal types (e.g., animals in feedlots or grazing on pasture).

5-4 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

 $^{^2}$ CO₂ emissions from livestock are not estimated because annual net CO₂ emissions are assumed to be zero—the CO₂ photosynthesized by plants is returned to the atmosphere as respired CO₂ (IPCC 2006).

Methane emission estimates from enteric fermentation are provided in Table 5-3 and Table 5-4. Total livestock CH_4 emissions in 2021 were 194.9 MMT CO_2 Eq. (6,962 kt). Beef cattle remain the largest contributor of CH_4 emissions from enteric fermentation, accounting for 71 percent in 2021. Emissions from dairy cattle in 2021 accounted for 25 percent, and the remaining emissions were from swine, horses, sheep, goats, American bison, mules and asses.³

Table 5-3: CH₄ Emissions from Enteric Fermentation (MMT CO₂ Eq.)

Livestock Type	1990	2005	2017	2018	2019	2020	2021
Beef Cattle	132.8	139.6	140.9	141.2	141.7	140.4	139.1
Dairy Cattle	43.3	41.3	48.0	48.6	48.5	48.8	49.1
Swine	2.3	2.6	3.0	3.1	3.2	3.2	3.1
Horses	1.1	2.0	1.4	1.4	1.3	1.2	1.1
Sheep	2.9	1.5	1.3	1.3	1.3	1.3	1.3
Goats	0.6	0.7	0.7	0.7	0.7	0.7	0.7
American Bison	0.1	0.5	0.4	0.4	0.4	0.5	0.5
Mules and Asses	+	0.1	0.1	0.1	0.1	0.1	0.1
Total	183.1	188.2	195.9	196.8	197.3	196.2	194.9

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 5-4: CH₄ Emissions from Enteric Fermentation (kt CH₄)

Livestock Type	1990	2005	2017	2018	2019	2020	2021
Beef Cattle	4,742	4,986	5,033	5,042	5,062	5,013	4,967
Dairy Cattle	1,547	1,473	1,715	1,737	1,732	1,744	1,754
Swine	81	92	108	110	115	116	111
Horses	40	70	51	48	46	43	40
Sheep	102	55	47	47	47	47	47
Goats	23	26	24	24	25	25	23
American Bison	4	17	15	15	16	16	17
Mules and Asses	1	2	3	3	3	3	3
Total	6,539	6,722	6,998	7,028	7,046	7,007	6,962

Note: Totals may not sum due to independent rounding.

From 1990 to 2021, emissions from enteric fermentation have increased by 6.5 percent. From 2020 to 2021, emissions decreased by 0.6 percent, largely driven by a decrease in beef cattle populations. While emissions generally follow trends in cattle populations, over the long term there are exceptions. For example, while dairy cattle emissions increased 13.4 percent over the entire time series, the population has declined by 3.5 percent, and milk production increased 62 percent (USDA 2021a; USDA 2022). These trends indicate that while emissions per head are increasing, emissions per unit of product (i.e., meat, milk) are decreasing.

Generally, from 1990 to 1995 emissions from beef cattle increased and then decreased from 1996 to 2004. These trends were mainly due to fluctuations in beef cattle populations and increased digestibility of feed for feedlot

_

³ Enteric fermentation emissions from poultry are not estimated because no IPCC method has been developed for determining enteric fermentation CH₄ emissions from poultry; at this time, developing a country-specific method would require a disproportionate amount of resources given the small magnitude of this source category. Enteric fermentation emissions from camels are not estimated because there is no significant population of camels in the United States. Given the insignificance of estimated camel emissions in terms of the overall level and trend in national emissions, there are no immediate improvement plans to include this emissions category in the Inventory. See Annex 5 for more information on significance of estimated camel emissions.

cattle. Beef cattle emissions generally increased from 2004 to 2007, as beef cattle populations increased, and an extensive literature review indicated a trend toward a decrease in feed digestibility for those years. Beef cattle emissions decreased again from 2007 to 2014, as populations again decreased, but increased from 2015 to 2019, consistent with another increase in population over those same years. Emissions and populations slightly declined from 2019 to 2021.

Emissions from dairy cattle generally trended downward from 1990 to 2004, along with an overall dairy cattle population decline during the same period. Similar to beef cattle, dairy cattle emissions rose from 2004 to 2007 due to population increases and a decrease in feed digestibility (based on an analysis of more than 350 dairy cow diets used by producers across the United States). Dairy cattle emissions continued to trend upward from 2007 to 2019, generally in line with dairy cattle population changes.

Regarding trends in other animals, populations of sheep have steadily declined, with an overall decrease of 54 percent since 1990. Horse populations are 1 percent greater than they were in 1990, but their numbers have been declining by an average of 4 percent annually since 2007. Goat populations increased by about 20 percent through 2007 followed by a steady decrease through 2012. After a steady increase of 1 percent annually through 2020, goat populations dropped by 5 percent in 2021. Swine populations have trended upward through most of the time series, increasing 43 percent from 1990 to 2020. However, swine populations decreased by around 4 percent from 2020 to 2021. The population of American bison more than quadrupled over the 1990 to 2020 time period, while the population of mules and asses increased by a factor of five.

Methodology and Time-Series Consistency

Livestock enteric fermentation emission estimate methodologies fall into two categories: cattle and other domesticated animals. Cattle, due to their large population, large size, and particular digestive characteristics, account for the majority of enteric fermentation CH₄ emissions from livestock in the United States. A more detailed methodology (i.e., IPCC Tier 2) was therefore applied to estimate emissions for all cattle. Emission estimates for other domesticated animals (horses, sheep, swine, goats, American bison, and mules and asses) were estimated using the IPCC Tier 1 approach, as suggested by the 2006 IPCC Guidelines (see the Planned Improvements section).

While the large diversity of animal management practices cannot be precisely characterized and evaluated, significant scientific literature exists that provides the necessary data to estimate cattle emissions using the IPCC Tier 2 approach. The Cattle Enteric Fermentation Model (CEFM), developed by EPA and used to estimate cattle CH₄ emissions from enteric fermentation using IPCC's Tier 2 method, incorporates this information and other analyses of livestock population, feeding practices, and production characteristics. For the current Inventory, CEFM results for 1990 through 2020 were carried over from the 1990 to 2020 Inventory (i.e., 2022 Inventory submission) to focus resources on CEFM improvements, and a simplified approach was used to estimate 2021 enteric emissions from cattle.

See Annex 3.10 for more detailed information on the methodology and data used to calculate CH₄ emissions from enteric fermentation. In addition, variables and the resulting emissions are also available at the state level in Annex 3.10.

1990-2020 Inventory Methodology for Cattle

National cattle population statistics were disaggregated into the following cattle sub-populations:

- Dairy Cattle
 - Calves
 - Heifer Replacements
 - Cows
- Beef Cattle
 - Calves
 - Heifer Replacements

- Heifer and Steer Stockers
- Animals in Feedlots (Heifers and Steer)
- Cows
- o Bulls

Calf birth rates, end-of-year population statistics, detailed feedlot placement information, and slaughter weight data were used to create a transition matrix that models cohorts of individual animal types and their specific emission profiles. The key variables tracked for each of the cattle population categories are described in Annex 3.10. These variables include performance factors such as pregnancy and lactation as well as average weights and weight gain. Annual cattle population data were obtained from the U.S. Department of Agriculture's (USDA) National Agricultural Statistics Service (NASS) *QuickStats* database (USDA 2021a).

Diet characteristics were estimated by region for dairy, grazing beef, and feedlot beef cattle. These diet characteristics were used to calculate digestible energy (DE) values (expressed as the percent of gross energy intake digested by the animal) and CH₄ conversion rates (Y_m) (expressed as the fraction of gross energy converted to CH₄) for each regional population category. The IPCC recommends Y_m ranges of 3.0±1.0 percent for feedlot cattle and 6.5±1.0 percent for other well-fed cattle consuming temperate-climate feed types (IPCC 2006). Given the availability of detailed diet information for different regions and animal types in the United States, DE and Y_m values unique to the United States were developed. The diet characterizations and estimation of DE and Y_m values were based on information from state agricultural extension specialists, a review of published forage quality studies and scientific literature, expert opinion, and modeling of animal physiology.

The diet characteristics for dairy cattle were based on Donovan (1999) and an extensive review of nearly 20 years of literature from 1990 through 2009. Estimates of DE were national averages based on the feed components of the diets observed in the literature for the following year groupings: 1990 through 1993, 1994 through 1998, 1999 through 2003, 2004 through 2006, 2007, and 2008 onward. Base year Y_m values by region were estimated using Donovan (1999). As described in ERG (2016), a ruminant digestion model (COWPOLL, as selected in Kebreab et al. 2008) was used to evaluate Y_m for each diet evaluated from the literature, and a function was developed to adjust regional values over time based on the national trend. Dairy replacement heifer diet assumptions were based on the observed relationship in the literature between dairy cow and dairy heifer diet characteristics.

For feedlot animals, the DE and Y_m values used for 1990 were recommended by Johnson (1999). Values for DE and Y_m for 1991 through 1999 were linearly extrapolated based on the 1990 and 2000 data. DE and Y_m values for 2000 onwards were based on survey data in Galyean and Gleghorn (2001) and Vasconcelos and Galyean (2007).

For grazing beef cattle, Y_m values were based on Johnson (2002), DE values for 1990 through 2006 were based on specific diet components estimated from Donovan (1999), and DE values from 2007 onwards were developed from an analysis by Archibeque (2011), based on diet information in Preston (2010) and USDA-APHIS:VS (2010). Weight and weight gains for cattle were estimated from Holstein (2010), Doren et al. (1989), Enns (2008), Lippke et al. (2000), Pinchack et al. (2004), Platter et al. (2003), Skogerboe et al. (2000), and expert opinion. See Annex 3.10 for more details on the method used to characterize cattle diets and weights in the United States.

Calves younger than 4 months are not included in emission estimates because calves consume mainly milk and the IPCC recommends the use of a Y_m of zero for all juveniles consuming only milk. Diets for calves aged 4 to 6 months are assumed to go through a gradual weaning from milk decreasing to 75 percent at 4 months, 50 percent at age 5 months, and 25 percent at age 6 months. The portion of the diet made up with milk still results in zero emissions. For the remainder of the diet, beef calf DE and Y_m are set equivalent to those of beef replacement heifers, while dairy calf DE is set equal to that of dairy replacement heifers and dairy calf Y_m is provided at 4 and 7 months of age by Soliva (2006). Estimates of Y_m for 5- and 6-month-old dairy calves are linearly interpolated from the values provided for 4 and 7 months.

⁴ Due to inconsistencies in the 2003 literature values, the 2002 values were used for 2003 as well.

_

To estimate CH₄ emissions, the population was divided into state, age, sub-type (i.e., dairy cows and replacements, beef cows and replacements, heifer and steer stockers, heifers and steers in feedlots, bulls, beef calves 4 to 6 months, and dairy calves 4 to 6 months), and production (i.e., pregnant, lactating) groupings to more fully capture differences in CH₄ emissions from these animal types. The transition matrix was used to simulate the age and weight structure of each sub-type on a monthly basis in order to more accurately reflect the fluctuations that occur throughout the year. Cattle diet characteristics were then used in conjunction with Tier 2 equations from IPCC (2006) to produce CH₄ emission factors for the following cattle types: dairy cows, beef cows, dairy replacements, beef replacements, steer stockers, heifer stockers, steer feedlot animals, heifer feedlot animals, bulls, and calves. To estimate emissions from cattle, monthly population data from the transition matrix were multiplied by the calculated emission factor for each cattle type. More details are provided in Annex 3.10.

2021 Inventory Methodology for Cattle

As noted above, a simplified approach for cattle enteric emissions was used in lieu of the CEFM for 2021 to focus resources on CEFM improvements. First, 2021 populations for each of the CEFM cattle subpopulations were estimated, then these populations were multiplied by the corresponding 2020 implied emission factors developed from the CEFM for the 1990 to 2020 Inventory. Dairy cow, beef cow, and bull populations for 2021 were based on data directly from the USDA-NASS QuickStats database (USDA 2021a, USDA 2022). Because the remaining CEFM cattle sub-population categories do not correspond exactly to the remaining QuickStats cattle categories, 2021 populations for these categories were estimated by extrapolating the 2020 populations based on percent changes from 2020 to 2021 in similar QuickStats categories, consistent with Volume 1, Chapter 5 of the 2006 IPCC Guidelines on time-series consistency. Table 5-5 lists the QuickStats categories used to estimate the percent change in population for each of the CEFM categories.

Table 5-5: Cattle Sub-Population Categories for 2021 Population Estimates

CEFM Cattle Category	USDA-NASS QuickStats Cattle Category
Dairy Calves	Cattle, Calves
Dairy Cows	Cattle, Cows, Milk
Dairy Replacements 7-11 months	Cattle, Heifers, GE 500 lbs, Milk Replacement
Dairy Replacements 12-23 months	Cattle, Heifers, GE 500 lbs, Milk Replacement
Bulls	Cattle, Bulls, GE 500 lbs
Beef Calves	Cattle, Calves
Beef Cows	Cattle, Cows, Beef
Beef Replacements 7-11 months	Cattle, Heifers, GE 500 lbs, Beef Replacement
Beef Replacements 12-23 months	Cattle, Heifers, GE 500 lbs, Beef Replacement
Steer Stockers	Cattle, Steers, GE 500 lbs
Heifer Stockers	Cattle, Heifers, GE 500 lbs, (Excl. Replacement)
Steer Feedlot	Cattle, On Feed
Heifer Feedlot	Cattle, On Feed

Non-Cattle Livestock

Emission estimates for other animal types were based on average emission factors (Tier 1 default IPCC emission factors) representative of entire populations of each animal type. Methane emissions from these animals accounted for a minor portion of total CH₄ emissions from livestock in the United States from 1990 through 2021. Additionally, the variability in emission factors for each of these other animal types (e.g., variability by age, production system, and feeding practice within each animal type) is less than that for cattle.

Annual livestock population data for 1990 to 2021 for sheep; swine; goats; horses; mules and asses; and American bison were obtained for available years from USDA-NASS (USDA 2022; USDA 2019). Horse, goat, and mule and ass

population data were available for 1987, 1992, 1997, 2002, 2007, 2012, and 2017 (USDA 2019); the remaining years between 1990 and 2021 were interpolated and extrapolated from the available estimates (with the exception of goat populations being held constant between 1990 and 1992). American bison population estimates were available from USDA for 2002, 2007, 2012, and 2017 (USDA 2019) and from the National Bison Association (1999) for 1990 through 1999. Additional years were based on observed trends from the National Bison Association (1999), interpolation between known data points, and extrapolation beyond 2012, as described in more detail in Annex 3.10.

Methane emissions from sheep, goats, swine, horses, American bison, and mules and asses were estimated by using emission factors utilized in Crutzen et al. (1986, cited in IPCC 2006; IPCC 2019). These emission factors are representative of typical animal sizes, feed intakes, and feed characteristics in developed countries. For American bison, the emission factor for buffalo was used and adjusted based on the ratio of live weights to the 0.75 power. The methodology is the same as that recommended by IPCC (2006).

Uncertainty

A quantitative uncertainty analysis for this source category was performed using the IPCC-recommended Approach 2 uncertainty estimation methodology based on a Monte Carlo Stochastic Simulation technique as described in ICF (2003). These uncertainty estimates were developed for the 1990 through 2001 Inventory (i.e., 2003 submission to the UNFCCC). While there are plans to update the uncertainty to reflect recent methodological updates and forthcoming changes (see Planned Improvements, below), at this time the uncertainty estimates were directly applied to the 2021 emission estimates in this Inventory.

A total of 185 primary input variables (177 for cattle and 8 for non-cattle) were identified as key input variables for the uncertainty analysis. A normal distribution was assumed for almost all activity- and emission factor-related input variables. Triangular distributions were assigned to three input variables (specifically, cow-birth ratios for the three most recent years included in the 2001 model run) to ensure only positive values would be simulated. For some key input variables, the uncertainty ranges around their estimates (used for inventory estimation) were collected from published documents and other public sources; others were based on expert opinion and best estimates. In addition, both endogenous and exogenous correlations between selected primary input variables were modeled. The exogenous correlation coefficients between the probability distributions of selected activityrelated variables were developed through expert judgment.

Among the individual cattle sub-source categories, beef cattle account for the largest amount of CH₄ emissions, as well as the largest degree of uncertainty in the emission estimates—due mainly to the difficulty in estimating the diet characteristics for grazing members of this animal group. Among non-cattle, horses represent the largest percent of uncertainty in the previous uncertainty analysis because the Food and Agricultural Organization (FAO) of the United Nations population estimates used for horses at that time had a higher degree of uncertainty than for the USDA population estimates used for swine, goats, and sheep. The horse populations are drawn from the same USDA source as the other animal types, and therefore the uncertainty range around horses is likely overestimated. Cattle calves, American bison, mules and asses were excluded from the initial uncertainty estimate because they were not included in emission estimates at that time.

The uncertainty ranges associated with the activity data-related input variables were plus or minus 10 percent or lower. However, for many emission factor-related input variables, the lower- and/or the upper-bound uncertainty estimates were over 20 percent. The results of the quantitative uncertainty analysis are summarized in Table 5-6. Based on this analysis, enteric fermentation CH₄ emissions in 2021 were estimated to be between 173.5 and 230.0 MMT CO₂ Eq. at a 95 percent confidence level, which indicates a range of 11 percent below to 18 percent above the 2021 emission estimate of 194.9 MMT CO₂ Eq.

Table 5-6: Approach 2 Quantitative Uncertainty Estimates for CH₄ Emissions from Enteric Fermentation (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertaint	y Range Relativ	ve to Emission I	Estimate ^{a, b, c}
		(MMT CO ₂ Eq.)	(MMT C	CO ₂ Eq.)	(1	%)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Enteric Fermentation	CH ₄	194.9	173.5	230.0	-11%	+18%

^a Range of emissions estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

In order to ensure the quality of the emission estimates from enteric fermentation, the General (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Category-specific or Tier 2 QA procedures included independent review of emission estimate methodologies from previous inventories.

As part of the quality assurance process, average implied emissions factors for U.S. dairy and beef cattle were developed based on CEFM output and compared to emission factors for other countries provided by IPCC (2006). This comparison is discussed in further detail in Annex 3.10.

Over the past few years, particular importance has been placed on harmonizing the data exchange between the enteric fermentation and manure management source categories. The current Inventory now utilizes the transition matrix from the CEFM for estimating cattle populations and weights for both source categories, and the CEFM is used to output volatile solids and nitrogen excretion estimates using the diet assumptions in the model in conjunction with the energy balance equations from the IPCC (2006). This approach facilitates the QA/QC process for both of these source categories. As noted in the Methodology discussion above, a simplified approach for cattle enteric emissions was used in lieu of the CEFM for 2021.

Recalculations Discussion

EPA updated the global warming potential (GWP) for calculating CO_2 -equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWPs provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC Fourth Assessment Report (AR4). The AR5 GWPs have been applied across the entire time series for consistency. This update resulted in an average annual increase of 12 percent for CO_2 -equivalent CH_4 emissions for the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Regular annual data reviews and updates are necessary to maintain an emissions inventory that reflects the current base of knowledge. In addition to the documented approaches currently used to address data availability,

^b Note that the relative uncertainty range was estimated with respect to the 2001 emission estimates from the 2003 submission and applied to the 2021 estimates.

^c The overall uncertainty calculated in 2003, and applied to the 2021 emission estimate, did not include uncertainty estimates for calves, American bison, and mules and asses. Additionally, for bulls the emissions estimate was based on the Tier 1 methodology. Since bull emissions are now estimated using the Tier 2 method, the uncertainty surrounding their estimates is likely lower than indicated by the previous uncertainty analysis.

EPA conducts the following annual assessments to identify and determine the applicability of newer data when updating the estimates to extend time series each year:

- Further research to improve the estimation of dry matter intake (as gross energy intake) using data from appropriate production systems;
- Updating input variables that are from older data sources, such as beef births by month, beef and dairy annual calving rates, and beef cow lactation rates;
- Investigating the availability of data for dairy births by month, to replace the current assumption that births are evenly distributed throughout the year;
- Investigating the availability of annual data for the DE, Y_m, and crude protein values of specific diet and feed components for grazing and feedlot animals;
- Further investigation on additional sources or methodologies for estimating DE for dairy cattle, given the many challenges in characterizing dairy cattle diets;
- Further evaluation of the assumptions about weights and weight gains for beef cows, such that trends beyond 2007 are updated, rather than held constant; and
- Further evaluation of the estimated weight for dairy cows (i.e., 1,500 lbs) that is based solely on Holstein cows as mature dairy cow weight is likely slightly overestimated, based on knowledge of the breeds of dairy cows in the United States.

Depending upon the outcome of ongoing investigations, future improvement efforts for enteric fermentation could include some of the following options which are additional to the regular updates, and may or may not have implications for regular updates once addressed:

- Potentially updating to a Tier 2 methodology for other animal types (i.e., sheep, swine, goats, horses); efforts to move to Tier 2 will consider the emissions significance of livestock types;
- Investigation of methodologies and emission factors for including enteric fermentation emission estimates from poultry;
- Comparison of the current CEFM with other models that estimate enteric fermentation emissions for quality assurance and verification;
- Investigation of recent research implications suggesting that certain parameters in enteric models may be simplified without significantly diminishing model accuracy; and
- Recent changes that have been implemented to the CEFM warrant an assessment of the current uncertainty analysis; therefore, a revision of the quantitative uncertainty surrounding emission estimates from this source category will be initiated. EPA plans to perform this uncertainty analysis following the completed updates to the CEFM.

EPA is continuously investigating these recommendations and potential improvements and working with USDA and other experts to utilize the best available data and methods for estimating emissions. Many of these improvements are major updates and may take multiple years to implement in full.

5.2 Manure Management (CRF Source Category 3B)

The treatment, storage, and transportation of livestock manure can produce anthropogenic CH_4 and N_2O emissions. Methane is produced by the anaerobic decomposition of manure and nitrous oxide is produced from direct and indirect pathways through the processes of nitrification and denitrification; in addition, there are many underlying factors that can affect these resulting emissions from manure management, as described below.

When livestock manure is stored or treated in systems that promote anaerobic conditions (e.g., as a liquid/slurry in lagoons, ponds, tanks, or pits), the decomposition of the volatile solids component in the manure tends to produce CH4. When manure is handled as a solid (e.g., in stacks or drylots) or deposited on pasture, range, or paddock lands, it tends to decompose aerobically and produce CO2 and little or no CH4. Ambient temperature, moisture, and manure storage or residency time affect the amount of CH4 produced because they influence the growth of the bacteria responsible for CH4 formation. For non-liquid-based manure systems, moist conditions (which are a function of rainfall and humidity) can promote CH4 production. Manure composition, which varies by animal diet, growth rate, and animal type (particularly the different animal digestive systems), also affects the amount of CH4 produced. In general, the greater the energy content of the feed, the greater the potential for CH4 emissions. However, some higher-energy feeds also are more digestible than lower quality forages, which can result in less overall waste excreted from the animal.

As previously stated, N_2O emissions are produced through both direct and indirect pathways. Direct N_2O emissions are produced as part of the nitrogen (N) cycle through the nitrification and denitrification of the N in livestock dung and urine.⁶ There are two pathways for indirect N_2O emissions. The first is the result of the volatilization of N in manure (as NH_3 and NO_3) and the subsequent deposition of these gases and their products (NH_4 ⁺ and NO_3 ⁻) onto soils and the surface of lakes and other waters. The second pathway is the runoff and leaching of N from manure into the groundwater below, into riparian zones receiving drain or runoff water, or into the ditches, streams, rivers, and estuaries into which the land drainage water eventually flows.

The production of direct N_2O emissions from livestock manure depends on the composition of the manure (manure includes both feces and urine), the type of bacteria involved in the process, and the amount of oxygen and liquid in the manure system. For direct N_2O emissions to occur, the manure must first be handled aerobically where organic N is mineralized or decomposed to N_4 which is then nitrified to NO_3 (producing some N_2O as a byproduct) (nitrification). Next, the manure must be handled anaerobically where the nitrate is then denitrified to N_2O and N_2 (denitrification). NO_x can also be produced during denitrification (Groffman et al. 2000; Robertson and Groffman 2015). These emissions are most likely to occur in dry manure handling systems that have aerobic conditions, but that also contain pockets of anaerobic conditions due to saturation. A very small portion of the total N excreted is expected to convert to N_2O in the waste management system (WMS).

Indirect N_2O emissions are produced when nitrogen is lost from the system through volatilization (as NH_3 or NO_x) or through runoff and leaching. The vast majority of volatilization losses from these operations are NH_3 . Although there are also some small losses of NO_x , there are no quantified estimates available for use, so losses due to volatilization are only based on NH_3 loss factors. Runoff losses would be expected from operations that house

5-12 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

 $^{^5}$ CO₂ emissions from livestock are not estimated because annual net CO₂ emissions are assumed to be zero – the CO₂ photosynthesized by plants is returned to the atmosphere as respired CO₂ (IPCC 2006).

 $^{^6}$ Direct and indirect N_2O emissions from dung and urine spread onto fields either directly as daily spread or after it is removed from manure management systems (i.e., lagoon, pit, etc.) and from livestock dung and urine deposited on pasture, range, or paddock lands are accounted for and discussed in the Agricultural Soil Management source category within the Agriculture sector.

animals or store manure in a manner that is exposed to weather. Runoff losses are also specific to the type of animal housed on the operation due to differences in manure characteristics. Little information is known about leaching from manure management systems as most research focuses on leaching from land application systems. However, storage systems are often designed to minimize leaching (e.g., clay soil or synthetic liners in lagoons). Since leaching losses are expected to be minimal, leaching losses are coupled with runoff losses and the runoff/leaching estimate provided in this chapter does not account for any leaching losses.

Estimates of CH₄ emissions from manure management in 2021 were 66.0 MMT CO₂ Eq. (2,358 kt); in 1990, emissions were 39.0 MMT CO₂ Eq. (1,394 kt). This represents a 69 percent increase in emissions from 1990. Emissions increased on average by 0.8 MMT CO₂ Eq. (2 percent) annually over this period. The majority of this increase is due to swine and dairy cow manure, where emissions increased 38 and 124 percent, respectively. From 2020 to 2021, there was a 1 percent decrease in total CH₄ emissions from manure management, mainly due to a decrease in swine and poultry populations.

Although a large quantity of managed manure in the United States is handled as a solid, producing little CH₄, the general trend in manure management, particularly for dairy cattle and swine (which are both shifting towards larger facilities), is one of increasing use of liquid systems. Also, new regulations controlling the application of manure nutrients to land have shifted manure management practices at smaller dairies from daily spread systems to storage and management of the manure on site. In many cases, manure management systems with the most substantial methane emissions are those associated with confined animal management operations where manure is handled in liquid-based systems. Nitrous oxide emissions from manure management vary significantly between the types of management system used and can also result in indirect emissions due to other forms of nitrogen loss from the system (IPCC 2006).

While national dairy animal populations have decreased since 1990, some states have seen increases in their dairy cattle populations as the industry becomes more concentrated in certain areas of the country and the number of animals contained on each facility increases. These areas of concentration, such as California, New Mexico, and Idaho, tend to utilize more liquid-based systems to manage (flush or scrape) and store manure. Thus, the shift toward larger dairy cattle and swine facilities since 1990 has translated into an increasing use of liquid manure management systems, which have higher potential CH₄ emissions than dry systems. This significant shift in both the dairy cattle and swine industries was accounted for by incorporating state and WMS-specific CH4 conversion factor (MCF) values in combination with the 1992, 1997, 2002, 2007, 2012, and 2017 farm-size distribution data reported in the U.S. Department of Agriculture (USDA) Census of Agriculture (USDA 2019d).

In 2021, total N₂O emissions from manure management were estimated to be 17.4 MMT CO₂ Eq. (66 kt); in 1990, emissions were 12.4 MMT CO₂ Eq. (47 kt). These values include both direct and indirect N₂O emissions from manure management. Nitrous oxide emissions have increased since 1990. Multiple drivers increase N₂O emissions, such as increasing nitrogen excretion rates for some animal types (see Annex, Table A-165) and increasing numbers of animals on feedlots versus other dry systems (e.g., pasture). Across the entire time series, the overall net effect is that N₂O emissions showed a 40 percent increase from 1990 to 2021, but recent declines in a few animal populations (e.g., swine and calves) resulted in a 0.5 percent decrease from 2020 to 2021.

Table 5-7 and Table 5-8 provide estimates of CH₄ and N₂O emissions from manure management by animal category.⁷

⁷ Manure management emissions from camels are not estimated because there is no significant population of camels in the United States. Given the insignificance of estimated camel emissions in terms of the overall level and trend in national emissions, there are no immediate improvement plans to include this emissions category in the Inventory. See Annex 5 for

more information on significance of estimated camel emissions.

Table 5-7: CH₄ and N₂O Emissions from Manure Management (MMT CO₂ Eq.)

Gas/Animal Type	1990	2005	2017	2018	2019	2020	2021
CH ₄ ^a	39.0	54.9	64.4	66.5	65.7	66.7	66.0
Dairy Cattle	16.0	26.4	35.0	35.8	34.6	35.5	35.9
Swine	17.4	23.5	23.5	24.7	25.0	25.1	24.0
Poultry	3.7	3.6	3.8	3.9	4.0	4.0	3.9
Beef Cattle	1.8	1.9	2.0	2.0	2.0	2.0	2.0
Horses	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Sheep	0.1	0.1	0.06	0.06	0.05	0.05	0.05
Goats	+	+	+	+	+	+	+
American Bison	+	+	+	+	+	+	+
Mules and Asses	+	+	+	+	+	+	+
N ₂ O ^b	12.4	14.5	16.9	17.2	17.4	17.5	17.4
Beef Cattle	5.2	6.4	7.9	8.1	8.2	8.3	8.3
Dairy Cattle	4.6	4.8	5.4	5.4	5.4	5.5	5.5
Swine	1.1	1.4	1.7	1.8	1.9	1.9	1.8
Poultry	1.2	1.4	1.5	1.5	1.5	1.5	1.5
Sheep	0.1	0.3	0.3	0.3	0.3	0.3	0.3
Horses	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Goats	+	+	+	+	+	+	+
Mules and Asses	+	+	+	+	+	+	+
American Bison ^c	NA						
Total	51.4	69.4	81.3	83.7	83.1	84.2	83.4

⁺ Does not exceed 0.05 MMT CO₂ Eq.

NA (Not Available)

Notes: N₂O emissions from manure deposited on pasture, range and paddock are included in the Agricultural Soils Management sector. Totals may not sum due to independent rounding.

Table 5-8: CH₄ and N₂O Emissions from Manure Management (kt)

Gas/Animal Type	1990	2005	2017	2018	2019	2020	2021
CH ₄ ^a	1,394	1,960	2,300	2,375	2,348	2,383	2,358
Dairy Cattle	572	943	1,248	1,278	1,237	1,269	1,283
Swine	621	812	840	882	891	895	858
Poultry	131	130	136	139	144	142	141
Beef Cattle	63	67	70	70	71	71	71
Horses	4	5	3	3	3	3	3
Sheep	3	2	2	2	2	2	2
Goats	+	4	+	+	+	+	+
American Bison	+	4	+	+	+	+	+
Mules and Asses	+	4	+	+	+	+	+
N_2O^b	47	55	64	65	65	66	66
Beef Cattle	20	24	30	30	31	31	31
Dairy Cattle	17	18	20	21	20	21	21
Swine	4	5	7	7	7	7	7
Poultry	5	5	5	6	6	6	6
Sheep	+	1	1	1	1	1	1

 $^{^{\}mathrm{a}}$ Accounts for CH $_{\mathrm{4}}$ reductions due to capture and destruction of CH $_{\mathrm{4}}$ at facilities using anaerobic digesters.

^b Includes both direct and indirect N₂O emissions.

^cThere are no American bison N₂O emissions from managed systems; American bison are maintained entirely on pasture, range, and paddock.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 477 of 1050 PageID 3925

Horses	+	+	+	+	+	+	+
Goats	+	+	+	+	+	+	+
Mules and Asses	+	+	+	+	+	+	+
American Bison ^c	NA						

⁺ Does not exceed 0.5 kt.

NA (Not Available)

Notes: N₂O emissions from manure deposited on pasture, range and paddock are included in the Agricultural Soils Management sector. Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

The methodologies presented in IPCC (2006) form the basis of the CH_4 and N_2O emission estimates for each animal type, including Tier 1, Tier 2, and use of the CEFM previously described for enteric fermentation. These methodologies use:

- IPCC (2006; 2019) Tier 1 default N₂O emission factors and MCFs for dry systems
- U.S. specific MCFs for liquid systems (ERG 2001)
- U.S. specific values for volatile solids (VS) production rate and nitrogen excretion rate for some animal types, including cattle values from the CEFM

This combination of Tier 1 and Tier 2 methods was applied to all livestock animal types. This section presents a summary of the methodologies used to estimate CH_4 and N_2O emissions from manure management. For the current Inventory, time-series results were carried over from the 1990 to 2020 Inventory (i.e., 2022 submission) and a simplified approach was used to estimate manure management emissions for 2021.

See Annex 3.11 for more detailed information on the methodologies (including detailed formulas and emission factors), data used to calculate CH_4 and N_2O emissions, and emission results (including input variables and results at the state-level) from manure management.

Methane Calculation Methods

The following inputs were used in the calculation of manure management CH₄ emissions for 1990 through 2020:

- Animal population data (by animal type and state);
- Typical animal mass (TAM) data (by animal type);
- Portion of manure managed in each WMS, by state and animal type;
- VS production rate (by animal type and state or United States);
- ullet Methane producing potential (B₀) of the volatile solids (by animal type); and
- Methane conversion factors (MCF), the extent to which the CH₄ producing potential is realized for each
 type of WMS (by state and manure management system, including the impacts of any biogas collection
 efforts).

Methane emissions were estimated by first determining activity data, including animal population, TAM, WMS usage, and waste characteristics. The activity data sources are described below:

Annual animal population data for 1990 through 2020 for all livestock types, except goats, horses, mules
and asses, and American bison were obtained from the USDA-NASS. For cattle, the USDA populations
were utilized in conjunction with birth rates, detailed feedlot placement information, and slaughter

^a Accounts for CH₄ reductions due to capture and destruction of CH₄ at facilities using anaerobic digesters.

^b Includes both direct and indirect N₂O emissions.

 $^{^{\}rm c}$ There are no American bison N_2O emissions from managed systems; American bison are maintained entirely on pasture, range, and paddock.

weight data to create the transition matrix in the Cattle Enteric Fermentation Model (CEFM) that models cohorts of individual animal types and their specific emission profiles. The key variables tracked for each of the cattle population categories are described in Section 5.1 and in more detail in Annex 3.10. Goat population data for 1992, 1997, 2002, 2007, 2012, and 2017; horse and mule and ass population data for 1987, 1992, 1997, 2002, 2007, 2012, and 2017; and American bison population for 2002, 2007, 2012, and 2017 were obtained from the *Census of Agriculture* (USDA 2019d). American bison population data for 1990 through 1999 were obtained from the National Bison Association (1999).

- The TAM is an annual average weight that was obtained for animal types other than cattle from
 information in USDA's Agricultural Waste Management Field Handbook (USDA 1996), the American
 Society of Agricultural Engineers, Standard D384.1 (ASAE 1998) and others (Meagher 1986; EPA 1992;
 Safley 2000; ERG 2003b; IPCC 2006; ERG 2010a). For a description of the TAM data used for cattle, see
 Annex 3.10.
- WMS usage was estimated for swine and dairy cattle for different farm size categories using state and regional data from USDA (USDA APHIS 1996; Bush 1998; Ott 2000; USDA 2016c) and EPA (ERG 2000a; EPA 2002a and 2002b; ERG 2018, ERG 2019). For beef cattle and poultry, manure management system usage data were not tied to farm size but were based on other data sources (ERG 2000a; USDA APHIS 2000; UEP 1999). For other animal types, manure management system usage was based on previous estimates (EPA 1992). American bison WMS usage was assumed to be the same as not on feed (NOF) cattle, while mules and asses were assumed to be the same as horses.
- VS production rates for all cattle except for calves were calculated by head for each state and animal type
 in the CEFM. VS production rates by animal mass for all other animals were determined using data from
 USDA's Agricultural Waste Management Field Handbook (USDA 1996 and 2008; ERG 2010b and 2010c)
 and data that was not available in the most recent Handbook were obtained from the American Society of
 Agricultural Engineers, Standard D384.1 (ASAE 1998) or the 2006 IPCC Guidelines (IPCC 2006). American
 bison VS production was assumed to be the same as NOF bulls.
- B₀ was determined for each animal type based on literature values (Morris 1976; Bryant et al. 1976; Hashimoto 1981; Hashimoto 1984; EPA 1992; Hill 1982; Hill 1984).
- MCFs for dry systems were set equal to default IPCC factors based on state climate for each year (IPCC 2006; IPCC 2019). MCFs for liquid/slurry, anaerobic lagoon, and deep pit systems were calculated based on the forecast performance of biological systems relative to temperature changes as predicted in the van't Hoff-Arrhenius equation which is consistent with IPCC (2006) Tier 2 methodology.
- Data from anaerobic digestion systems with CH₄ capture and combustion were obtained from the EPA
 AgSTAR Program, including information available in the AgSTAR project database (EPA 2021). Anaerobic
 digester emissions were calculated based on estimated methane production and collection and
 destruction efficiency assumptions (ERG 2008).
- For all cattle except for calves, the estimated amount of VS (kg per animal-year) managed in each WMS for each animal type, state, and year were taken from the CEFM, assuming American bison VS production to be the same as NOF bulls. For animals other than cattle, the annual amount of VS (kg per year) from manure excreted in each WMS was calculated for each animal type, state, and year. This calculation multiplied the animal population (head) by the VS excretion rate (kg VS per 1,000 kg animal mass per day), the TAM (kg animal mass per head) divided by 1,000, the WMS distribution (percent), and the number of days per year (365.25).

The estimated amount of VS managed in each WMS was used to estimate the CH_4 emissions (kg CH_4 per year) from each WMS. The amount of VS (kg per year) was multiplied by the B_0 (m³ CH_4 per kg VS), the MCF for that WMS (percent), and the density of CH_4 (kg CH_4 per m³ CH_4). The CH_4 emissions for each WMS, state, and animal type were summed to determine the total U.S. CH_4 emissions. See details in Step 5 of Annex 3.11.

The following approach was used in the calculation of manure management CH₄ emissions for 2021:

- Obtain 2021 national-level animal population data: Sheep, poultry, and swine data were downloaded from USDA-NASS Quickstats (USDA 2022). Cattle populations were obtained from the CEFM (see NIR Section 5.1and Annex 3.10). Data for goats, horses, bison, mules, and asses were extrapolated based on the 2011 through 2020 population values to reflect recent trends in animal populations.
- Multiply the national populations by the animal-specific 2020 implied emission factors⁸ for CH₄ to
 calculate national-level 2021 CH₄ emissions estimates by animal type. These methods were utilized in
 order to maintain time-series consistency as referenced in Volume 1, Chapter 5 of the 2006 IPCC
 Guidelines.

Nitrous Oxide Calculation Methods

The following inputs were used in the calculation of direct and indirect manure management N₂O emissions for 1990 through 2020:

- Animal population data (by animal type and state);
- TAM data (by animal type);

Case 5:23-cv-00304-H

- Portion of manure managed in each WMS (by state and animal type);
- Total Kjeldahl N excretion rate (Nex);
- Direct N₂O emission factor (EF_{WMS});
- Indirect N₂O emission factor for volatilization (EF_{volatilization});
- Indirect N₂O emission factor for runoff and leaching (EF_{runoff/leach});
- Fraction of N loss from volatilization of NH₃ and NO_x (Frac_{gas}); and
- Fraction of N loss from runoff and leaching (Fracrunoff/leach).

Nitrous oxide emissions were estimated by first determining activity data, including animal population, TAM, WMS usage, and waste characteristics. The activity data sources (except for population, TAM, and WMS, which were described above) are described below:

- Nex for all cattle except for calves were calculated by head for each state and animal type in the CEFM.
 Nex rates by animal mass for all other animals were determined using data from USDA's *Agricultural Waste Management Field Handbook* (USDA 1996 and 2008; ERG 2010b and 2010c) and data from the American Society of Agricultural Engineers, Standard D384.1 (ASAE 1998) and IPCC (2006). American bison Nex were assumed to be the same as NOF bulls.⁹
- All N₂O emission factors (direct and indirect) were taken from IPCC (2006).
- Country-specific estimates for the fraction of N loss from volatilization (Frac_{gas}) and runoff and leaching (Frac_{runoff/leach}) were developed. Frac_{gas} values were based on WMS-specific volatilization values as estimated from EPA's *National Emission Inventory Ammonia Emissions from Animal Agriculture Operations* (EPA 2005). Frac_{runoff/leaching} values were based on regional cattle runoff data from EPA's Office of Water (EPA 2002b; see Annex 3.11).

⁸ An implied emission factor is defined as emissions divided by the relevant measure of activity; the implied emission factor is equal to emissions per activity data unit. For source/sink categories that are composed of several subcategories, the emissions and activity data are summed up across all subcategories. Hence, the implied emission factors are generally not equivalent to the emission factors used to calculate emission estimates, but are average values that could be used, with caution, in data comparisons (UNFCCC 2017).

 $^{^9}$ Nex of American bison on grazing lands are accounted for and discussed in the Agricultural Soil Management source category and included under pasture, range and paddock (PRP) emissions. Because American bison are maintained entirely on unmanaged WMS and N_2O emissions from unmanaged WMS are not included in the Manure Management source category, there are no N_2O emissions from American bison included in the Manure Management source category.

To estimate N_2O emissions for cattle (except for calves), the estimated amount of N excreted (kg per animal-year) that is managed in each WMS for each animal type, state, and year were taken from the CEFM. For calves and other animals, the amount of N excreted (kg per year) in manure in each WMS for each animal type, state, and year was calculated. The population (head) for each state and animal was multiplied by TAM (kg animal mass per head) divided by 1,000, the nitrogen excretion rate (Nex, in kg N per 1,000 kg animal mass per day), WMS distribution (percent), and the number of days per year.

Direct N_2O emissions were calculated by multiplying the amount of N excreted (kg per year) in each WMS by the N_2O direct emission factor for that WMS (EF_{WMS}, in kg N_2O -N per kg N) and the conversion factor of N_2O -N to N_2O . These emissions were summed over state, animal, and WMS to determine the total direct N_2O emissions (kg of N_2O per year). See details in Step 6 of Annex 3.11.

Indirect N_2O emissions from volatilization (kg N_2O per year) were then calculated by multiplying the amount of N excreted (kg per year) in each WMS by the fraction of N lost through volatilization (Frac_{gas}) divided by 100, the emission factor for volatilization (EF_{volatilization}, in kg N_2O per kg N), and the conversion factor of N_2O -N to N_2O . Indirect N_2O emissions from runoff and leaching (kg N_2O per year) were then calculated by multiplying the amount of N excreted (kg per year) in each WMS by the fraction of N lost through runoff and leaching (Frac_{runoff/leach}) divided by 100, the emission factor for runoff and leaching (EF_{runoff/leach}, in kg N_2O per kg N), and the conversion factor of N_2O -N to N_2O . The indirect N_2O emissions from volatilization and runoff and leaching were summed to determine the total indirect N_2O emissions. See details in Step 6 of Annex 3.11.

Following these steps, direct and indirect N_2O emissions were summed to determine total N_2O emissions (kg N_2O per year) for the years 1990 to 2020.

Methodological approaches, changes to historic data, and other parameters were applied to the entire time series to ensure consistency in emissions estimates from 1990 through 2020. In some cases, the activity data source changed over the time series. For example, updated WMS distribution data were applied to 2016 for dairy cows and 2009 for swine. While previous WMS distribution data were from another data source, EPA integrated the more recent data source to reflect the best available current WMS distribution data for these animals. EPA assumed a linear interpolation distribution for years between the two data sources. Refer to Annex 3.11 for more details on data sources and methodology.

The following approach was used in the calculation of manure management N₂O emissions for 2021:

- Obtain 2021 national-level animal population data: Sheep, poultry, and swine data were downloaded from USDA-NASS Quickstats (USDA 2022). Cattle populations were obtained from the CEFM, see Section 5.1 and Annex 3.10 (Enteric Fermentation). Data for goats, horses, bison, mules, and asses were extrapolated based on the 2011 through 2020 population values to reflect recent trends in animal populations.
- The national populations were multiplied by the animal-specific 2020 implied emission factors for N₂O (which combines both direct and indirect N₂O) to calculate national-level 2021 N₂O emissions estimates by animal type. These methods were utilized in order to maintain time-series consistency as referenced in Volume 1, Chapter 5 of the 2006 IPCC Guidelines.

Uncertainty

An analysis (ERG 2003a) was conducted for the manure management emission estimates presented in the 1990 through 2001 Inventory (i.e., 2003 submission to the UNFCCC) to determine the uncertainty associated with estimating CH₄ and N₂O emissions from livestock manure management. The quantitative uncertainty analysis for this source category was performed in 2002 through the IPCC-recommended Approach 2 uncertainty estimation methodology, the Monte Carlo Stochastic Simulation technique. The uncertainty analysis was developed based on the methods used to estimate CH₄ and N₂O emissions from manure management systems. A normal probability distribution was assumed for each source data category. The series of equations used were condensed into a single equation for each animal type and state. The equations for each animal group contained four to five variables

around which the uncertainty analysis was performed for each state. While there are plans to update the uncertainty to reflect recent manure management updates and forthcoming changes (see Planned Improvements, below), at this time the uncertainty estimates were directly applied to the 2021 emission estimates.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 5-9. Manure management CH₄ emissions in 2021 were estimated to be between 54.1 and 79.2 MMT CO₂ Eq. at a 95 percent confidence level, which indicates a range of 18 percent below to 20 percent above the actual 2021 emission estimate of 66.0 MMT CO₂ Eq. At the 95 percent confidence level, N₂O emissions were estimated to be between 14.6 and 21.6 MMT CO₂ Eq. (or approximately 16 percent below and 24 percent above the actual 2021 emission estimate of 17.4 MMT CO2 Eq.).

Table 5-9: Approach 2 Quantitative Uncertainty Estimates for CH₄ and N₂O (Direct and Indirect) Emissions from Manure Management (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty	y Range Relati	ve to Emissior	n Estimate ^a
		(MMT CO ₂ Eq.)	(MMT C	O ₂ Eq.)	(%	6)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Manure Management	CH ₄	66.0	54.1	79.2	-18%	+20%
Manure Management	N_2O	17.4	14.6	21.6	-16%	+24%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General (Tier 1) and category-specific (Tier 2) QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Tier 2 activities focused on comparing estimates for the previous and current Inventories for N₂O emissions from managed systems and CH₄ emissions from livestock manure. All errors identified were corrected. Order of magnitude checks were also conducted, and corrections made where needed. In addition, manure N data were checked by comparing state-level data with bottom-up estimates derived at the county level and summed to the state level. Similarly, a comparison was made by animal and WMS type for the full time series, between national level estimates for N excreted, both for pasture and managed systems, and the sum of county estimates for the full time series. This was done to ensure consistency between excreted N within the manure management sector and those data provided to the managed soils sector. All errors identified were corrected.

Time-series data, including population, are validated by experts to ensure they are representative of the best available U.S.-specific data. The U.S.-specific values for TAM, Nex, VS, Bo, and MCF were also compared to the IPCC default values and validated by experts. Although significant differences exist in some instances, these differences are due to the use of U.S.-specific data and the differences in U.S. agriculture as compared to other countries. The U.S. manure management emission estimates use the most reliable country-specific data, which are more representative of U.S. animals and systems than the IPCC (2006) default values.

For additional verification of the 1990 to 2020 estimates, the implied CH₄ emission factors for manure management (kg of CH₄ per head per year) were compared against the default IPCC (2006) values. Table 5-10 presents the implied emission factors of kg of CH₄ per head per year used for the manure management emission estimates as well as the IPCC (2006) default emission factors. The U.S. implied emission factors fall within the range of the IPCC (2006) default values, except in the case of sheep, goats, and some years for horses and dairy cattle. The U.S. implied emission factors are greater than the IPCC (2006) default value for those animals due to the use of U.S.-specific data for typical animal mass and VS excretion. There is an increase in implied emission factors for dairy cattle and swine across the time series. This increase reflects the dairy cattle and swine industry

trend towards larger farm sizes; large farms are more likely to manage manure as a liquid and therefore produce more CH₄ emissions.

Table 5-10: IPCC (2006) Implied Emission Factor Default Values Compared with Calculated Values for CH₄ from Manure Management (kg/head/year)

Animal Type	IPCC Default CH ₄ Emission Factors (kg/head/year) Factors									
	(kg/head/year)a	1990	2005		2017	2018	2019	2020	2021	
Dairy Cattle	48-112	29.3	53.0		66.0	67.3	65.6	67.5	67.5	
Beef Cattle	1-2	0.8	0.8		0.9	0.9	0.9	0.9	0.9	
Swine	10-45	11.5	13.3		11.6	12.0	11.6	11.6	11.6	
Sheep	0.19-0.37	0.3	0.4		0.4	0.4	0.4	0.4	0.4	
Goats	0.13-0.26	0.1	0.1		0.1	0.1	0.1	0.1	0.1	
Poultry	0.02-1.4	0.1	0.1		0.1	0.1	0.1	0.1	0.1	
Horses	1.56-3.13	1.9	1.4		1.2	1.2	1.2	1.2	1.2	
American Bison	NA	0.8	0.9		0.9	0.9	0.9	0.9	0.9	
Mules and Asses	0.76-1.14	0.4	0.4		0.4	0.4	0.4	0.4	0.4	

Note: CH₄ implied emission factors were not calculated for 2021 due to the simplified emissions estimation approach used to estimate emissions for that year. 2020 values were used for 2021.

NA (Not Applicable)

In addition, default IPCC (2006) emission factors for N_2O were compared to the U.S. Inventory implied N_2O emission factors. Default N_2O emission factors from the 2006 IPCC Guidelines were used to estimate N_2O emission from each WMS in conjunction with U.S.-specific Nex values. The implied emission factors differed from the U.S. Inventory values due to the use of U.S.-specific Nex values and differences in populations present in each WMS throughout the time series.

Recalculations Discussion

EPA updated global warming potentials (GWP) for calculating CO_2 -equivalent emissions of CH_4 and N_2O to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 has increased from 25 to 28, leading to an increase in the calculated CO_2 -equivalent emissions of CH_4 , while the GWP of N_2O has decreased from 298 to 265, leading to a decrease in the calculated CO_2 -equivalent emissions of N_2O . The cumulative effect of these recalculations had a low impact on the overall manure management emission estimates.

On average, CO₂-equivalent total emissions increased by 5.7 percent for each year of the time series compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Regular annual data reviews and updates are necessary to maintain an emissions inventory that reflects the current base of knowledge. In addition to the documented approaches currently used to address data availability, EPA conducts data assessments and is actively pursuing the following investigations for the 2024 Inventory submission:

 Continuing to investigate new sources of WMS data. EPA is working with the USDA Natural Resources Conservation Service to collect data for potential improvements to the Inventory.

^a Ranges reflect *2006 IPCC Guidelines* (Volume 4, Table 10.14) default emission factors for North America across different climate zones.

- Determining appropriate updates to other default N₂O emission factors to reflect IPCC (2019).
 Many of the improvements identified below are major updates and may take multiple years to fully implement. Potential improvements (long-term improvements) for future Inventory years include:
- Revising the anaerobic digestion estimates to estimate CH₄ emissions *reductions* due to the use of anaerobic digesters (the Inventory currently estimates only emissions from anaerobic digestion systems).
- Investigating the updated IPCC 2019 Refinement default N₂O emissions factor for anaerobic digesters.
 Historically, EPA has not estimated N₂O emissions from digesters as the default guidance was no emissions. Incorporating AgSTAR data for N₂O emissions, like CH₄ emissions, is a longer-term goal for EPA.
- Investigating updates to the current anaerobic digester MCFs based on IPCC (2019).
- Investigating the typical animal masses used in each the Enteric Fermentation and Manure Management inventories and confirm they align.

EPA is aware of the following potential updates or improvements but notes that implementation will be based on available resources and data availability:

- Updating the B₀ data used in the Inventory, as data become available. EPA is conducting outreach with counterparts from USDA as to available data and research on B₀.
- Comparing CH₄ and N₂O emission estimates with estimates from other models and more recent studies and compare the results to the Inventory.
- Comparing manure management emission estimates with on-farm measurement data to identify opportunities for improved estimates.
- Comparing VS and Nex data to literature data to identify opportunities for improved estimates.
- Determining if there are revisions to the U.S.-specific method for calculating liquid systems for MCFs based on updated guidance from the IPCC 2019 Refinement.
- Investigating improved emissions estimate methodologies for swine pit systems with less than one month of storage (the recently updated swine WMS data included this WMS category).
- Improving the linkages with the Enteric Fermentation source category estimates. For future Inventories, it may be beneficial to have the CEFM and Manure Management calculations in the same model, as they rely on much of the same activity data and on each other's outputs to properly calculate emissions.
- Revising the uncertainty analysis to address changes that have been implemented to the CH_4 and N_2O estimates. The plan is to align the timing of the updated Manure Management uncertainty analysis with the uncertainty analysis for Enteric Fermentation.

5.3 Rice Cultivation (CRF Source Category 3C)

Most of the world's rice is grown on flooded fields (Baicich 2013) that create anaerobic conditions leading to CH₄ production through a process known as methanogenesis. Approximately 60 to 90 percent of the CH₄ produced by methanogenic bacteria in flooded rice fields is oxidized in the soil and converted to CO₂ by methanotrophic bacteria. The remainder is emitted to the atmosphere (Holzapfel-Pschorn et al. 1985; Sass et al. 1990) or transported as dissolved CH₄ into groundwater and waterways (Neue et al. 1997). Methane is transported to the atmosphere primarily through the rice plants, but some CH₄ also escapes via ebullition (i.e., bubbling through the water) and to a much lesser extent by diffusion through the water (van Bodegom et al. 2001).

Water management is arguably the most important factor affecting CH₄ emissions in rice cultivation, and improved water management has the largest potential to mitigate emissions (Yan et al. 2009). Upland rice fields are not flooded, and therefore do not produce CH₄, but large amounts of CH₄ can be emitted in continuously irrigated fields, which is the most common practice in the United States (USDA 2012). Single or multiple aeration events with drainage of a field during the growing season can significantly reduce these emissions (Wassmann et al. 2000a), but drainage may also increase N2O emissions. Deepwater rice fields (i.e., fields with flooding depths greater than one meter, such as natural wetlands) tend to have fewer living stems reaching the soil, thus reducing the amount of CH₄ transport to the atmosphere through the plant compared to shallow-flooded systems (Sass 2001).

Other management practices also influence CH₄ emissions from flooded rice fields including rice residue straw management and application of organic amendments, in addition to cultivar selection due to differences in the amount of root exudates 10 among rice varieties (Neue et al. 1997). These practices influence the amount of organic matter available for methanogenesis, and some practices, such as mulching rice straw or composting organic amendments, can reduce the amount of labile carbon and limit CH₄ emissions (Wassmann et al. 2000b). Fertilization practices also influence CH₄ emissions, particularly the use of fertilizers with sulfate, which can reduce CH₄ emissions (Wassmann et al. 2000b; Linquist et al. 2012). Other environmental variables also impact the methanogenesis process such as soil temperature and soil type. Soil temperature regulates the activity of methanogenic bacteria, which in turn affects the rate of CH₄ production. Soil texture influences decomposition of soil organic matter, but is also thought to have an impact on oxidation of CH₄ in the soil (Sass et al. 1994).

Rice is currently cultivated in thirteen states, including Arkansas, California, Florida, Illinois, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, New York, South Carolina, Tennessee and Texas. Soil types, rice varieties, and cultivation practices vary across the United States, but most farmers apply fertilizers and do not harvest crop residues. In addition, a second, ratoon rice crop is sometimes grown in the Southeastern region of the country. Ratoon crops are produced from regrowth of the stubble remaining after the harvest of the first rice crop. Methane emissions from ratoon crops are higher than those from the primary crops due to the increased amount of labile organic matter available for anaerobic decomposition in the form of relatively fresh crop residue straw. Emissions tend to be higher in rice fields if the residues have been in the field for less than 30 days before planting the next rice crop (Lindau and Bollich 1993; IPCC 2006; Wang et al. 2013).

A combination of Tier 1 and 3 methods are used to estimate CH₄ emissions from rice cultivation across most of the time series, while a surrogate data method has been applied to estimate national emissions for 2016 to 2021 in this Inventory due to lack of data in the later years of the time series. National emission estimates based on surrogate data will be recalculated in a future Inventory with the Tier 1 and 3 methods as data becomes available.

Overall, rice cultivation is a minor source of CH₄ emissions in the United States relative to other source categories (see Table 5-11, Table 5-12, and Figure 5-3). Most emissions occur in Arkansas, California, Louisiana, Mississippi, Missouri and Texas. In 2021, CH₄ emissions from rice cultivation were 16.8 MMT CO₂ Eq. (600 kt). Annual emissions fluctuate between 1990 and 2021, which is largely due to differences in the amount of rice harvested areas over time, which has been decreasing over the past two decades. Consequently, emissions in 2021 are 6 percent lower than emissions in 1990.

Table 5-11: CH₄ Emissions from Rice Cultivation (MMT CO₂ Eq.)

State	1990	2005	2017	2018	2019	2020	2021
Arkansas	6.0	8.8	NE	NE	NE	NE	NE
California	3.7	3.8	NE	NE	NE	NE	NE
Florida	+	+	NE	NE	NE	NE	NE

 $^{^{10}}$ The roots of rice plants add organic material to the soil through a process called "root exudation." Root exudation is thought to enhance decomposition of the soil organic matter and release nutrients that the plant can absorb for production. The amount of root exudate produced by a rice plant over a growing season varies among rice varieties.

Illinois	+	+	NE	NE	NE	NE	NE
Kentucky	+	+	NE	NE	NE	NE	NE
Louisiana	2.9	3.2	NE	NE	NE	NE	NE
Minnesota	+	0.1	NE	NE	NE	NE	NE
Mississippi	1.3	1.5	NE	NE	NE	NE	NE
Missouri	0.6	1.3	NE	NE	NE	NE	NE
New York	+	+	NE	NE	NE	NE	NE
South Carolina	+	+	NE	NE	NE	NE	NE
Tennessee	+	+	NE	NE	NE	NE	NE
Texas	3.4	1.5	NE	NE	NE	NE	NE
Total	17.9	20.2	16.7	17.4	16.9	17.6	16.8

⁺ Does not exceed 0.05 MMT CO₂ Eq.

NE (Not Estimated). State-level emissions are not estimated for 2016 through 2021 in this Inventory. A surrogate data method is used to estimate emissions for these years and are produced only at the national scale.

Note: Totals may not sum due to independent rounding.

Table 5-12: CH₄ Emissions from Rice Cultivation (kt)

State	1990	2005	2017	2018	2019	2020	2021
Arkansas	216	315	NE	NE	NE	NE	NE
California	131	134	NE	NE	NE	NE	NE
Florida	+	1	NE	NE	NE	NE	NE
Illinois	+	+	NE	NE	NE	NE	NE
Kentucky	+	+	NE	NE	NE	NE	NE
Louisiana	103	113	NE	NE	NE	NE	NE
Minnesota	1	2	NE	NE	NE	NE	NE
Mississippi	45	55	NE	NE	NE	NE	NE
Missouri	22	45	NE	NE	NE	NE	NE
New York	+	+	NE	NE	NE	NE	NE
South Carolina	+	+	NE	NE	NE	NE	NE
Tennessee	+	+	NE	NE	NE	NE	NE
Texas	122	54	NE	NE	NE	NE	NE
Total	640	720	596	623	602	630	600

⁺ Does not exceed 0.5 kt.

NE (Not Estimated). State-level emissions are not estimated for 2016 through 2021 in this Inventory. A surrogate data method is used to estimate emissions for these years and are produced only at the national scale.

Note: Totals may not sum due to independent rounding.

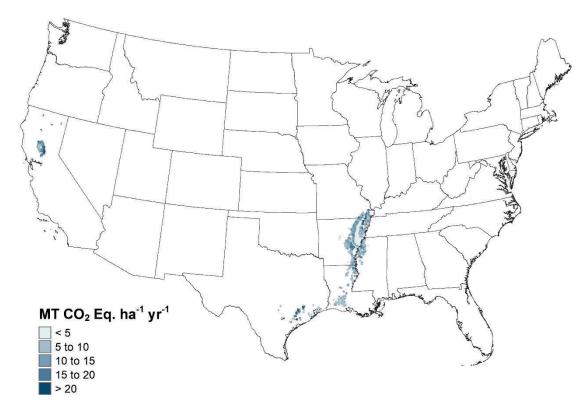


Figure 5-3: Annual CH₄ Emissions from Rice Cultivation, 2015

Note: Only national-scale emissions are estimated for 2016 through 2021 in this Inventory using the surrogate data method described in the Methodology section; therefore, the fine-scale emission patterns in this map are based on the estimates for 2015.

Methodology and Time-Series Consistency

The methodology used to estimate CH $_4$ emissions from rice cultivation is based on a combination of IPCC Tier 1 and 3 approaches. The Tier 3 method utilizes the DayCent process-based model to estimate CH $_4$ emissions from rice cultivation (Cheng et al. 2013), and has been tested in the United States (see Annex 3.12) and Asia (Cheng et al. 2013, 2014). The model simulates hydrological conditions and thermal regimes, organic matter decomposition, root exudation, rice plant growth and its influence on oxidation of CH $_4$, as well as CH $_4$ transport through the plant and via ebullition (Cheng et al. 2013). The method captures the influence of organic amendments and rice straw management on methanogenesis in the flooded soils, and ratooning of rice crops with a second harvest during the growing season. In addition to CH $_4$ emissions, DayCent simulates soil C stock changes and N $_2$ O emissions (Parton et al. 1987 and 1998; Del Grosso et al. 2010), and allows for a seamless set of simulations for crop rotations that include both rice and non-rice crops.

The Tier 1 method is applied to estimate CH₄ emissions from rice when grown in rotation with crops that are not simulated by DayCent, such as vegetable crops. The Tier 1 method is also used for areas converted between agriculture (i.e., cropland and grassland) and other land uses, such as forest land, wetland, and settlements. In addition, the Tier 1 method is used to estimate CH₄ emissions from organic soils (i.e., Histosols) and from areas with very gravelly, cobbly, or shaley soils (greater than 35 percent by volume). The Tier 3 method using DayCent has not been fully tested for estimating emissions associated with these conditions.

The Tier 1 method for estimating CH₄ emissions from rice production utilizes a default base emission rate and scaling factors (IPCC 2006). The base emission rate represents emissions for continuously flooded fields with no

organic amendments. Scaling factors are used to adjust the base emission rate for water management and organic amendments that differ from continuous flooding with no organic amendments. The method accounts for preseason and growing season flooding; types and amounts of organic amendments; and the number of rice production seasons within a single year (i.e., single cropping, ratooning, etc.). The Tier 1 analysis is implemented in the Agriculture and Land Use National Greenhouse Gas Inventory (ALU) software (Ogle et al. 2016). 11

Rice cultivation areas are based on crop and land use histories recorded in the USDA National Resources Inventory (NRI) survey (USDA-NRCS 2018). The NRI is a statistically-based sample of all non-federal land, and includes 489,178 survey locations in agricultural land for the conterminous United States and Hawaii of which 1,960 include one or more years of rice cultivation. The Tier 3 method is used to estimate CH₄ emissions from 1,655 of the NRI survey locations, and the remaining 305 survey locations are estimated with the Tier 1 method. Each NRI survey location is associated with an "expansion factor" that allows scaling of CH4 emission to the entire land base with rice cultivation (i.e., each expansion factor represents the amount of area with the same land-use/management history as the survey location). Land-use and some management information in the NRI (e.g., crop type, soil attributes, and irrigation) were collected on a 5-year cycle beginning in 1982, along with cropping rotation data in 4 out of 5 years for each 5-year time period (i.e., 1979 to 1982, 1984 to 1987, 1989 to 1992, and 1994 to 1997). The NRI program began collecting annual data in 1998, with data through 2015 (USDA-NRCS 2018). The current Inventory only uses NRI data through 2015, and the harvested rice areas in each state are presented in Table 5-13.

Table 5-13: Rice Area Harvested (1,000 Hectares)

State/Crop	1990	2005	2017	2018	2019	2020	2021
Arkansas	600	784	NE	NE	NE	NE	NE
California	249	236	NE	NE	NE	NE	NE
Florida	0	4	NE	NE	NE	NE	NE
Illinois	0	0	NE	NE	NE	NE	NE
Kentucky	0	0	NE	NE	NE	NE	NE
Louisiana	381	402	NE	NE	NE	NE	NE
Minnesota	4	9	NE	NE	NE	NE	NE
Mississippi	123	138	NE	NE	NE	NE	NE
Missouri	48	94	NE	NE	NE	NE	NE
New York	1	0	NE	NE	NE	NE	NE
South Carolina	0	0	NE	NE	NE	NE	NE
Tennessee	0	1	NE	NE	NE	NE	NE
Texas	302	118	NE	NE	NE	NE	NE
Total	1,707	1,788	NE	NE	NE	NE	NE

NE (Not Estimated). Area data will be updated in the next Inventory.

Note: Totals may not sum due to independent rounding.

The Southeastern states have sufficient growing periods for a ration crop in some years (Table 5-14). For example, the growing season length is occasionally sufficient for ration crops to be grown on about 1 percent of the rice fields in Arkansas. No data are available about ratoon crops in Missouri or Mississippi, and the average amount of ratooning in Arkansas was assigned to these states. Ratoon cropping occurs much more frequently in Louisiana (LSU 2015 for years 2000 through 2013, 2015) and Texas (TAMU 2015 for years 1993 through 2015), averaging 32 percent and 45 percent of rice acres planted, respectively. Florida also has a large fraction of area with a ratoon crop (49 percent). Ratoon rice crops are not grown in California.

¹¹ See http://www.nrel.colostate.edu/projects/ALUsoftware/.

Table 5-14: Average Ratooned Area as Percent of Primary Growth Area (Percent)

State	1990-2015
Arkansas ^a	1%
California	0%
Florida ^b	49%
Louisiana ^c	32%
Mississippi ^a	1%
Missouria	1%
Texas ^d	45%

^a Arkansas: 1990–2000 (Slaton 1999 through 2001); 2001–2011 (Wilson 2002 through 2007, 2009 through 2012); 2012–2013 (Hardke 2013, 2014). Estimates of ratooning for Missouri and Mississippi are based on the data from Arkansas.

While rice crop production in the United States includes a minor amount of land with mid-season drainage or alternate wet-dry periods, the majority of rice growers use continuously flooded water management systems (Hardke 2015; UCCE 2015; Hollier 1999; Way et al. 2014). Therefore, continuous flooding was assumed in the DayCent simulations and the Tier 1 method. Variation in flooding can be incorporated in future Inventories if water management data are collected.

Winter flooding is another key practice associated with water management in rice fields, and the impact of winter flooding on CH₄ emissions is addressed in the Tier 3 and Tier 1 analyses. Flooding is used to prepare fields for the next growing season, and to create waterfowl habitat (Young 2013; Miller et al. 2010; Fleskes et al. 2005). Fitzgerald et al. (2000) suggests that as much as 50 percent of the annual emissions may occur during winter flooding. Winter flooding is a common practice with an average of 34 percent of fields managed with winter flooding in California (Miller et al. 2010; Fleskes et al. 2005), and approximately 21 percent of the fields managed with winter flooding in Arkansas (Wilson and Branson 2005 and 2006; Wilson and Runsick 2007 and 2008; Wilson et al. 2009 and 2010; Hardke and Wilson 2013 and 2014; Hardke 2015). No data are available on winter flooding for Texas, Louisiana, Florida, Missouri, or Mississippi. For these states, the average amount of flooding is assumed to be similar to Arkansas. In addition, the amount of flooding is assumed to be relatively constant over the Inventory time series.

A surrogate data method is used to estimate emissions from 2016 to 2021 associated with the rice CH₄ emissions for Tier 1 and 3 methods. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors was used to estimate the relationship between the surrogate data and emissions data from 1990 through 2015, which were derived using the Tier 1 and 3 methods (Brockwell and Davis 2016). Surrogate data are based on rice commodity statistics from USDA-NASS. ¹² See Box 5-2 for more information about the surrogate data method.

Box 5-2: Surrogate Data Method

An approach to extend the time series is needed to estimate emissions from rice cultivation because there are gaps in activity data at the end of the time series. This is mainly due to the fact that the National Resources Inventory (NRI) does not release data every year, and the NRI is a key data source for estimating greenhouse gas emissions.

A surrogate data method has been selected to impute missing emissions at the end of the time series. A linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to estimate the relationship between the surrogate data and the observed 1990 to 2015 emissions data that has

^b Florida - Ratoon: *1990–2000* (Schueneman 1997, 1999 through 2001); *2001* (Deren 2002); *2002–2003* (Kirstein 2003 through 2004, 2006); *2004* (Cantens 2004 through 2005); *2005–2013* (Gonzalez 2007 through 2014).

^cLouisiana: 1990–2013 (Linscombe 1999, 2001 through 2014).

^d Texas: 1990–2002 (Klosterboer 1997, 1999 through 2003); 2003–2004 (Stansel 2004 through 2005); 2005 (Texas Agricultural Experiment Station 2006); 2006–2013 (Texas Agricultural Experiment Station 2007 through 2014).

¹² See https://quickstats.nass.usda.gov/.

been compiled using the inventory methods described in this section. The model to extend the time series is given by

$$Y = X\beta + \varepsilon$$
,

where Y is the response variable (e.g., CH₄ emissions), Xβ is the surrogate data that is used to predict the missing emissions data, and ϵ is the remaining unexplained error. Models with a variety of surrogate data were tested, including commodity statistics, weather data, or other relevant information. Parameters are estimated from the observed data for 1990 to 2015 using standard statistical techniques, and these estimates are used to predict the missing emissions data for 2016 to 2021.

A critical issue in using splicing methods is to adequately account for the additional uncertainty introduced by predicting emissions with related information without compiling the full inventory. For example, predicting CH₄ emissions will increase the total variation in the emission estimates for these specific years, compared to those years in which the full inventory is compiled. This added uncertainty is quantified within the model framework using a Monte Carlo approach. The approach requires estimating parameters for results in each Monte Carlo simulation for the full inventory (i.e., the surrogate data model is refit with the emissions estimated in each Monte Carlo iteration from the full inventory analysis with data from 1990 to 2015).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015, and a surrogate data method is used to approximate emissions for the remainder of the 2016 to 2021 time series based on the emissions data from 1990 to 2015. This surrogate data method is consistent with data splicing methods in IPCC (2006).

Uncertainty

Sources of uncertainty in the Tier 3 method include management practices, uncertainties in model structure (i.e., algorithms and parameterization), and variance associated with the NRI sample. Sources of uncertainty in the IPCC (2006) Tier 1 method include the emission factors, management practices, and variance associated with the NRI sample. A Monte Carlo analysis was used to propagate uncertainties in the Tier 1 and 3 methods. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo analysis associated with the surrogate data method (See Box 5-2 for information about propagating uncertainty with the surrogate data method). The uncertainties from the Tier 1 and 3 approaches are combined to produce the final CH₄ emissions estimate using simple error propagation (IPCC 2006). Additional details on the uncertainty methods are provided in Annex 3.12.

Rice cultivation CH₄ emissions in 2021 were estimated to be between 4.2 and 29.4 MMT CO₂ Eq. at a 95 percent confidence level, which indicates a range of 75 percent below to 75 percent above the 2021 emission estimate of 16.8 MMT CO₂ Eq. (see Table 5-15).

Table 5-15: Approach 2 Quantitative Uncertainty Estimates for CH₄ Emissions from Rice Cultivation (MMT CO₂ Eq. and Percent)

Source	Inventory Method	Gas	2021 Emission Estimate (MMT CO ₂ Eq.)	Uncertainty Rang			n Estimate ^a %)	
				Lower	Upper	Lower	Upper	
				Bound	Bound	Bound	Bound	
Rice Cultivation	Tier 3	CH₄	14.0	1.4	26.6	-90%	+90%	
Rice Cultivation	Tier 1	CH_4	2.8	1.5	4.1	-48%	+48%	
Rice Cultivation	Total	CH₄	16.8	4.2	29.4	-75%	+75%	

^a Range of emission estimates is the 95 percent confidence interval.

QA/QC and Verification

General (Tier 1) and category-specific (Tier 2) QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Quality control measures include checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors.

Model results are compared to field measurements to verify if results adequately represent CH₄ emissions. The comparisons included over 17 long-term experiments, representing about 238 combinations of management treatments across all the sites. A statistical relationship was developed to assess uncertainties in the model structure, adjusting the estimates for model bias and assessing precision in the resulting estimates (methods are described in Ogle et al. 2007). See Annex 3.12 for more information.

Recalculations Discussion

EPA updated global warming potential (GWP) for calculating CO_2 -equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series for consistency. As a result of this change, CO_2 -equivalent emissions increased by an annual average of 1.9 MMT CO_2 Eq., or 12 percent, over the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

A key planned improvement for rice cultivation is to fill several gaps in the management activity including compiling new data on water management, organic amendments and ratooning practices in rice cultivation systems. This improvement is expected to be completed for the next Inventory, but may not be prioritized depending on the needs for other inventory improvements in the Agriculture sector.

5.4 Agricultural Soil Management (CRF Source Category 3D)

Nitrous oxide is naturally produced in soils through the microbial processes of nitrification and denitrification that is driven by the availability of mineral nitrogen (N) (Firestone and Davidson 1989). Mineral N is made available in soils through decomposition of soil organic matter and plant litter, as well as asymbiotic fixation of N from the atmosphere. Several agricultural activities increase mineral N availability in soils that lead to direct N_2O emissions at the site of a management activity (see Figure 5-4) (Mosier et al. 1998). These activities include synthetic N fertilization; application of managed livestock manure; application of other organic materials such as biosolids (i.e., treated sewage sludge); deposition of manure on soils by domesticated animals in pastures, range,

5-28 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

 $^{^{13}}$ Nitrification and denitrification are driven by the activity of microorganisms in soils. Nitrification is the aerobic microbial oxidation of ammonium (NH₄+) to nitrate (NO₃-), and denitrification is the anaerobic microbial reduction of nitrate to N₂. Nitrous oxide is a gaseous intermediate product in the reaction sequence of nitrification and denitrification.

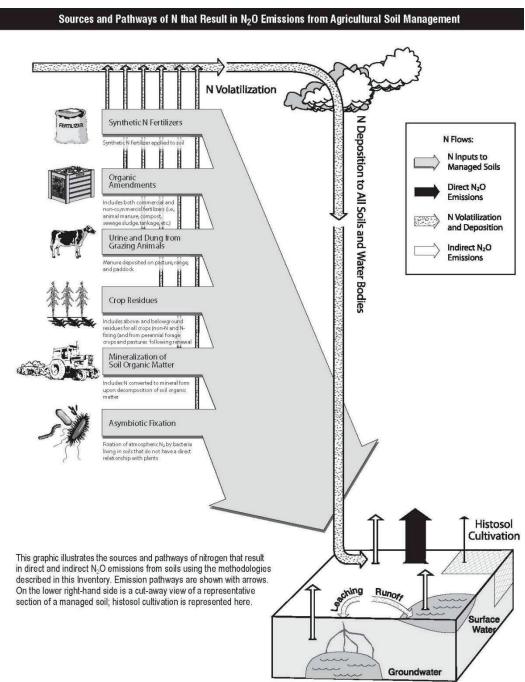
 $^{^{14}}$ Asymbiotic N fixation is the fixation of atmospheric N₂ by bacteria living in soils that do not have a direct relationship with plants.

and paddocks (PRP) (i.e., unmanaged manure); retention of crop residues (N-fixing legumes and non-legume crops and forages); and drainage of organic soils 15 (i.e., Histosols) (IPCC 2006). Additionally, agricultural soil management activities, including irrigation, drainage, tillage practices, cover crops, and fallowing of land, can influence N mineralization from soil organic matter and levels of asymbiotic N fixation. Indirect emissions of N_2O occur when N is transported from a site and is subsequently converted to N_2O ; there are two pathways for indirect emissions: (1) volatilization and subsequent atmospheric deposition of applied/mineralized N, and (2) surface runoff and leaching of applied/mineralized N into groundwater and surface water. 16 Direct and indirect emissions from agricultural lands are included in this section (i.e., cropland and grassland as defined in Section 6.1 Representation of the U.S. Land Base). Nitrous oxide emissions from forest land and settlements soils are found in Sections 6.2 and 6.10, respectively.

 $^{^{15}}$ Drainage of organic soils in former wetlands enhances mineralization of N-rich organic matter, thereby increasing N₂O emissions from these soils.

 $^{^{16}}$ These processes entail volatilization of applied or mineralized N as NH₃ and NO_x, transformation of these gases in the atmosphere (or upon deposition), and deposition of the N primarily in the form of particulate NH₄⁺, nitric acid (HNO₃), and NO_x. In addition, hydrological processes lead to leaching and runoff of NO₃⁻ that is converted to N₂O in aquatic systems, e.g., wetlands, rivers, streams and lakes. Note: N₂O emissions are not estimated for aquatic systems associated with N inputs from terrestrial systems in order to avoid double-counting.

Figure 5-4: Sources and Pathways of N that Result in N₂O Emissions from Agricultural Soil Management



Agricultural soils produce the majority of N_2O emissions in the United States. Estimated emissions in 2021 are 294.0 MMT CO_2 Eq. (1,110 kt) (see Table 5-16 and Table 5-17). Annual N_2O emissions from agricultural soils are 2.1 percent greater in 2021 compared to 1990, but emissions fluctuated between 1990 and 2021 due to inter-annual variability largely associated with weather patterns, synthetic fertilizer use, and crop production. From 1990 to 2021, cropland accounted for 68 percent of total direct emissions on average from agricultural soil management, while grassland accounted for 32 percent. On average, 77 percent of indirect emissions are from croplands and 23

percent from grasslands. Estimated direct and indirect N_2O emissions by sub-source category are shown in Table 5-18 and Table 5-19.

Table 5-16: N₂O Emissions from Agricultural Soils (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Direct	259.5	263.8	279.2	290.5	276.6	261.9	264.7
Cropland	176.1	180.0	193.4	200.4	189.2	181.8	181.5
Grassland	83.4	83.9	85.9	90.1	87.4	80.1	83.2
Indirect	28.5	27.7	31.4	33.2	32.7	28.7	29.3
Cropland	21.8	21.1	24.7	26.0	25.6	22.3	22.8
Grassland	6.7	6.6	6.6	7.2	7.1	6.4	6.5
Total	288.0	291.5	310.6	323.8	309.3	290.5	294.0

Notes: Estimates for 2021 are based on a data splicing method, except for other organic N amendments that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Table 5-17: N₂O Emissions from Agricultural Soils (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Direct	979	996	1,054	1,096	1,044	988	999
Cropland	664	679	730	756	714	686	685
Grassland	315	317	324	340	330	302	314
Indirect	107	104	118	125	124	108	111
Cropland	82	80	93	98	97	84	86
Grassland	25	25	25	27	27	24	25
Total	1,087	1,100	1,172	1,222	1,167	1,096	1,110

Notes: Estimates for 2021 are based on a data splicing method, except for other organic N that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Table 5-18: Direct N_2O Emissions from Agricultural Soils by Land Use Type and N Input Type (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Cropland	176.1	180.0	193.4	200.4	189.2	181.8	181.4
Mineral Soilse	172.6	176.6	190.1	197.5	186.2	178.9	178.5
Synthetic Fertilizer	61.0	65.3	69.8	68.8	65.6	64.3	62.7
Organic Amendment ^a	11.5	12.7	14.4	14.5	14.3	14.5	14.7
Residue N ^b	26.4	26.2	26.2	28.5	25.3	28.8	24.4
Mineralization and							
Asymbiotic Fixation	73.6	72.5	79.7	85.6	81.0	71.3	76.8
Drained Organic Soils	3.4	3.2	3.0	3.0	2.9	2.9	2.9
Grassland	83.4	83.9	86.1	90.1	87.4	80.1	83.2
Mineral Soils	81.2	81.7	83.8	87.9	85.2	77.8	81.0
Synthetic Fertilizer	+	+	+	+	+	+	+
PRP Manure	15.8	14.6	13.9	14.5	13.8	13.5	14.0
Managed Manure ^c	+	+	+	+	+	+	+
Biosolids (i.e., treated							
Sewage Sludge)	0.2	0.4	0.6	0.6	0.6	0.6	0.6
Residue N ^d	21.4	22.4	22.7	22.3	22.5	22.7	20.9
Mineralization and							
Asymbiotic Fixation	43.8	44.3	46.6	50.5	48.3	41.0	45.4
Drained Organic Soils	2.3	2.2	2.3	2.2	2.2	2.3	2.3
Total	259.5	263.8	279.2	290.5	276.6	261.9	264.7

- + Does not exceed 0.05 MMT CO₂ Eq.
- ^a Organic amendment inputs include managed manure, daily spread manure, and commercial organic fertilizers (i.e., dried blood, dried manure, tankage, compost, and other).
- ^b Cropland residue N inputs include N in unharvested cover crops as well as harvested crops.
- ^c Managed manure inputs include managed manure and daily spread manure amendments that are applied to grassland soils.
- ^d Grassland residue N inputs include residual biomass, both legumes and grasses, that is ungrazed and becomes dead organic matter.
- ^e Cropland Mineral Soils totals also include a small amount of PRP manure.

Notes: Estimates for 2021 are based on a data splicing method, except for other organic N amendments that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Table 5-19: Indirect N₂O Emissions from Agricultural Soils (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Cropland	21.8	21.1	24.7	26.0	25.6	22.3	22.8
Volatilization & Atm.							
Deposition	6.7	7.1	7.7	8.2	7.3	7.7	7.6
Surface Leaching & Run-Off	15.1	14.0	17.0	17.9	18.4	14.6	15.2
Grassland	6.7	6.6	6.6	7.2	7.1	6.4	6.5
Volatilization & Atm.							
Deposition	3.9	3.9	3.8	3.9	3.7	3.5	3.6
Surface Leaching & Run-Off	2.8	2.6	2.8	3.4	3.4	2.9	2.9
Total	28.5	27.7	31.4	33.2	32.7	28.7	29.3

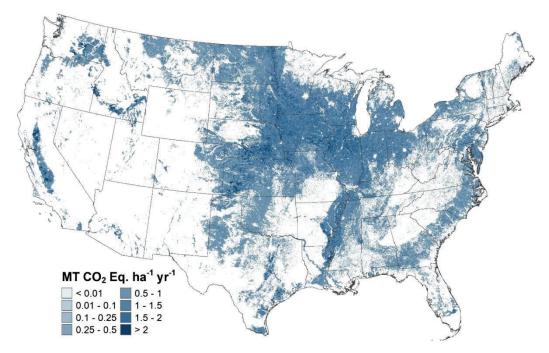
Notes: Estimates for 2021 are based on a data splicing method, except for other organic N amendments that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Figure 5-5 and Figure 5-6 show regional patterns for direct N_2O emissions. Figure 5-7 and Figure 5-8 show indirect N_2O emissions from volatilization, and Figure 5-9 and Figure 5-10 show the indirect N_2O emissions from leaching and runoff in croplands and grasslands, respectively.

Direct N₂O emissions from croplands occur throughout all of the cropland regions but tend to be high in the Midwestern Corn Belt Region (particularly, Illinois, Iowa, Kansas, Minnesota, Nebraska), where a large portion of the land is used for growing highly fertilized corn and N-fixing soybean crops (see Figure 5-5). There are high emissions from the Southeastern region, and portions of the Great Plains, such as North Dakota and Montana. Emissions are also high in the Lower Mississippi River Basin from Missouri to Louisiana, and highly productive irrigated areas, such as Platte River, which flows from Colorado and Wyoming through Nebraska, Snake River Valley in Idaho, and the Central Valley in California. Direct emissions are low in mountainous regions of the Eastern United States because only a small portion of land is cultivated, and in much of the Western United States where rainfall and access to irrigation water are limited, in addition to mountainous, which are generally not suitable for crop production.

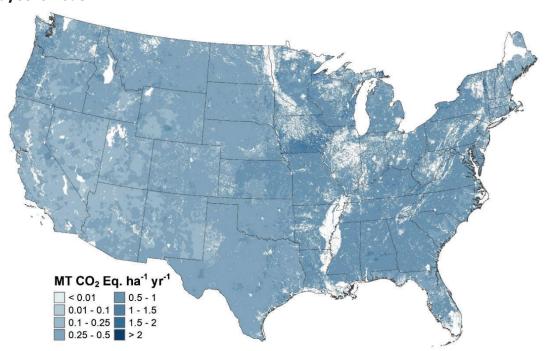
Direct N₂O emissions from grasslands are more evenly distributed throughout the United States compared to emissions from cropland due to suitable areas for grazing in most regions (see Figure 5-6). Total emissions tend be highest in the Great Plains and western United States where a large proportion of the land is dominated by grasslands with cattle and sheep grazing (particularly Texas, Montana, New Mexico, Oklahoma, and South Dakota).

Figure 5-5: Croplands, 2020 Annual Direct N₂O Emissions Estimated Using the Tier 3 DayCent Model



Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Figure 5-6: Grasslands, 2020 Annual Direct N_2O Emissions Estimated Using the Tier 3 DayCent Model

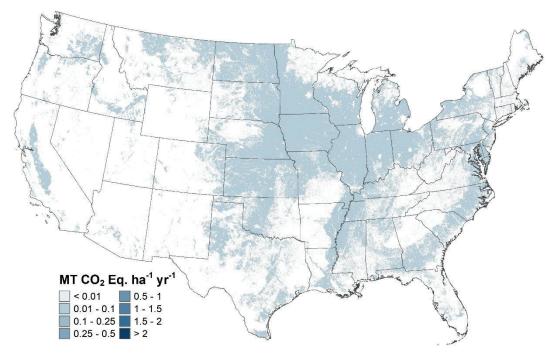


Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Indirect N_2O emissions from volatilization in croplands have a similar pattern as the direct N_2O emissions with higher emissions in the Midwestern Corn Belt, Lower Mississippi River Basin, Southeastern region, and parts of the Great Plains and irrigated areas of the Western United States. Indirect N_2O emissions from volatilization in grasslands are higher in the Eastern and Central United States, along with relatively small areas scattered around the Western United States. The higher emissions are partly due to large additions of PRP manure N, which in turn, stimulates NH_3 volatilization.

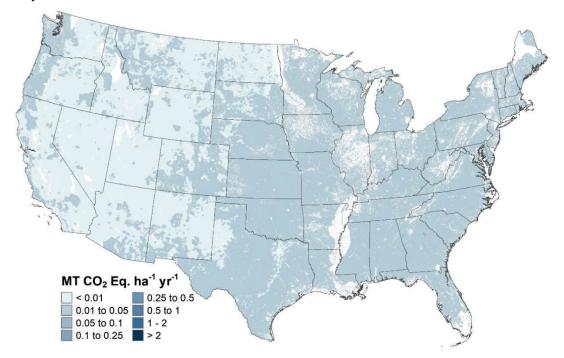
Indirect N₂O emissions from surface runoff and leaching of applied/mineralized N in croplands is highest in the Midwestern Corn Belt. There are also relatively high emissions associated with N management in the Lower Mississippi River Basin, Piedmont region of the Southeastern United States and the Mid-Atlantic states. In addition, areas of high emissions occur in portions of the Great Plains that have relatively large areas of irrigated croplands with high leaching rates of applied/mineralized N. Indirect N₂O emissions from surface runoff and leaching of applied/mineralized N in grasslands are higher in the eastern United States and coastal Northwest region. These regions have greater precipitation and higher levels of leaching and runoff compared to arid to semi-arid regions in the Western United States.

Figure 5-7: Croplands, 2020 Annual Indirect N₂O Emissions from Volatilization Using the Tier 3 DayCent Model



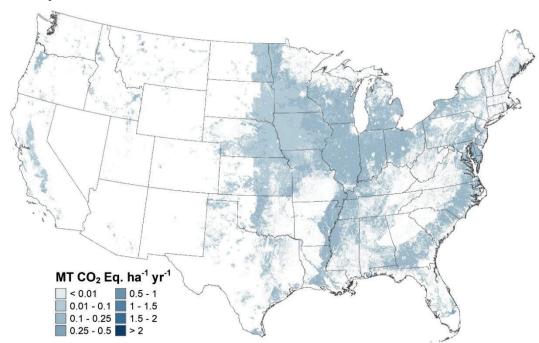
Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Figure 5-8: Grasslands, 2020 Annual Indirect N₂O Emissions from Volatilization Using the Tier 3 DayCent Model



Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Figure 5-9: Croplands, 2020 Annual Indirect N₂O Emissions from Leaching and Runoff Using the Tier 3 DayCent Model



Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

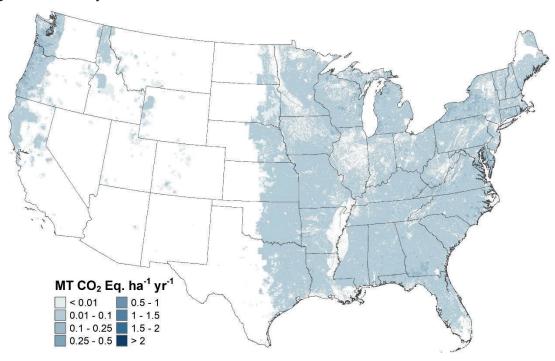


Figure 5-10: Grasslands, 2020 Annual Indirect N₂O Emissions from Leaching and Runoff Using the Tier 3 DayCent Model

Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Methodology and Time-Series Consistency

The 2006 IPCC Guidelines (IPCC 2006) divide emissions from the agricultural soil management source category into five components, including (1) direct emissions from N additions to cropland and grassland mineral soils from synthetic fertilizers, biosolids (i.e., treated sewage sludge), crop residues (legume N-fixing and non-legume crops), and organic amendments; (2) direct emissions from soil organic matter mineralization due to land use and management change; (3) direct emissions from drainage of organic soils in croplands and grasslands; (4) direct emissions from soils due to manure deposited by livestock on PRP grasslands; and (5) indirect emissions from soils and water from N additions and manure deposition to soils that lead to volatilization, leaching, or runoff of N and subsequent conversion to N₂O.

In this source category, the United States reports on all croplands, as well as all managed grasslands, whereby anthropogenic greenhouse gas emissions are estimated in a manner consistent with the managed land concept (IPCC 2006), including direct and indirect N_2O emissions from asymbiotic fixation¹⁷ and mineralization of N associated with decomposition of soil organic matter and residues. One recommendation from IPCC (2006) that has not been completely adopted is the estimation of emissions from grassland pasture renewal, which involves occasional plowing to improve forage production in pastures. Currently no data are available to address pasture renewal. In addition, estimates of N_2O emissions from managed croplands and grasslands are not available for Alaska and Hawaii except for managed manure and PRP N, and biosolid additions for Alaska, and managed manure

¹⁷ N inputs from asymbiotic N fixation are not directly addressed in *2006 IPCC Guidelines*, but are a component of the N inputs and total emissions from managed lands and are included in the Tier 3 approach developed for this source.

and PRP N, biosolid additions, and crop residue for Hawaii. There is a planned improvement to include the additional sources of emissions in a future Inventory.

Direct N₂O Emissions

The methodology used to estimate direct N_2O emissions from agricultural soil management in the United States is based on a combination of IPCC Tier 1 and 3 approaches, along with application of a splicing method for latter years in the Inventory time series (IPCC 2006; Del Grosso et al. 2010). A Tier 3 process-based model (DayCent) is used to estimate direct emissions from a variety of crops that are grown on mineral (i.e., non-organic) soils, as well as the direct emissions from non-federal grasslands except for applications of biosolids (i.e., treated sewage sludge) (Del Grosso et al. 2010). The Tier 3 approach has been specifically designed and tested to estimate N_2O emissions in the United States, accounting for more of the environmental and management influences on soil N_2O emissions than the IPCC Tier 1 method (see Box 5-3 for further elaboration). Moreover, the Tier 3 approach addresses direct N_2O emissions and soil C stock changes from mineral cropland soils in a single analysis. Carbon and N dynamics are linked in plant-soil systems through biogeochemical processes of microbial decomposition and plant production (McGill and Cole 1981). Coupling the two source categories (i.e., agricultural soil C and N_2O) in a single inventory analysis ensures that there is consistent activity data and treatment of the processes, and interactions are considered between C and N cycling in soils.

Crop and land use histories are based on the USDA National Resources Inventory (NRI) (USDA-NRCS 2020), and extended through 2020 using the USDA-NASS Crop Data Layer Product (USDA-NASS 2021; Johnson and Mueller 2010). The areas have been modified in the original NRI survey through a process in which the Forest Inventory and Analysis (FIA) survey data and the National Land Cover Dataset (Yang et al. 2018) are harmonized with the NRI data. This process ensures that the land use areas are consistent across all land use categories (See Section 6.1, Representation of the U.S. Land Base for more information).

The NRI is a statistically-based sample of all non-federal land, ¹⁸ and includes 364,334 survey locations on agricultural land for the conterminous United States that are included in the Tier 3 method. The Tier 1 approach is used to estimate the emissions from 161,161 locations in the NRI survey across the time series, which are designated as cropland or grassland (discussed later in this section). Each survey location is associated with an "expansion factor" that allows scaling of N₂O emissions from NRI survey locations to the entire country (i.e., each expansion factor represents the amount of area with the same land-use/management history as the survey location). Each NRI survey location was sampled on a 5-year cycle from 1982 until 1997. For cropland, data were collected in 4 out of 5 years in the cycle (i.e., 1979 through 1982, 1984 through 1987, 1989 through 1992, and 1994 through 1997). In 1998, the NRI program began collecting annual data, which are currently available through 2017 (USDA-NRCS 2020). For 2018 through 2020, the time series is extended with the crop data provided in USDA-NASS CDL (USDA-NASS 2021). CDL data have a 30 to 58 m spatial resolution, depending on the year. NRI survey locations are overlaid on the CDL in a geographic information system, and the crop types are extracted to extend the cropping histories for the inventory analysis.

Box 5-3: Tier 1 vs. Tier 3 Approach for Estimating N₂O Emissions

The IPCC (2006) Tier 1 approach is based on multiplying activity data on different N inputs (i.e., synthetic fertilizer, manure, N fixation, etc.) by the appropriate default IPCC emission factors to estimate N_2O emissions on an input-by-input basis. The Tier 1 approach requires a minimal amount of activity data, readily available in most countries (e.g., total N applied to crops); calculations are simple; and the methodology is highly transparent. In contrast, the Tier 3 approach developed for this Inventory is based on application of a process-based model (i.e., DayCent) that represents the interaction of N inputs, land use and management, as well as environmental conditions at specific locations, such as freeze-thaw effects that generate pulses of N_2O

¹⁸ The NRI survey does include sample points on federal lands, but the program does not collect data from those sample locations.

emissions (Wagner-Riddle et al. 2017, Del Grosso et al. 2022). Consequently, the Tier 3 approach accounts for land-use and management impacts and their interaction with environmental factors, such as weather patterns and soil characteristics, in a more comprehensive manner, which will enhance or dampen anthropogenic influences. However, the Tier 3 approach requires more detailed activity data (e.g., crop-specific N fertilization rates), additional data inputs (e.g., daily weather, soil types), and considerable computational resources and programming expertise. The Tier 3 methodology is less transparent, and thus it is critical to evaluate the output of Tier 3 methods against measured data in order to demonstrate that the method is an improvement over lower tier methods for estimating emissions (IPCC 2006). Another important difference between the Tier 1 and Tier 3 approaches relates to assumptions regarding N cycling. Tier 1 assumes that N added to a system is subject to N2O emissions only during that year and cannot be stored in soils and contribute to N2O emissions in subsequent years. This is a simplifying assumption that may create bias in estimated N₂O emissions for a specific year. In contrast, the process-based model in the Tier 3 approach includes the legacy effect of N added to soils in previous years that is re-mineralized from soil organic matter and emitted as N₂O during subsequent years.

DayCent is used to estimate N2O emissions associated with production of alfalfa hay, barley, corn, cotton, dry beans, grass hay, grass-clover hay, lentils, oats, onions, peanuts, peas, potatoes, rice, sorghum, soybeans, sugar beets, sunflowers, sweet potatoes, tobacco, tomatoes, and wheat, but is not applied to estimate N₂O emissions from other crops or rotations with other crops, 19 such as sugarcane, some vegetables, and perennial/horticultural crops. Areas that are converted between agriculture (i.e., cropland and grassland) and other land uses, such as forest land, wetland and settlements, are not simulated with DayCent. DayCent is also not used to estimate emissions from land areas with very gravelly, cobbly, or shaley soils in the topsoil (greater than 35 percent by volume in the top 30 cm of the soil profile), or to estimate emissions from drained organic soils (Histosols). The Tier 3 method has not been fully tested for estimating N2O emissions associated with these crops and rotations, land uses, as well as organic soils or cobbly, gravelly, and shaley mineral soils. In addition, federal grassland areas are not simulated with DayCent due to limited activity data on land use histories. For areas that are not included in the DayCent simulations, Tier 1 methods are used to estimate emissions, including (1) direct emissions from N inputs for crops on mineral soils that are not simulated by DayCent; (2) direct emissions from PRP N additions on federal grasslands; (3) direct emissions for land application of biosolids (i.e., treated sewage sludge) to soils; and (4) direct emissions from drained organic soils in croplands and grasslands.

A splicing method is used to estimate soil N₂O emissions for 2021 at the national scale because new NRI activity data have not been incorporated into the analysis for those years. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2020 emissions that are derived using the Tier 3 method. Surrogate data for these regression models includes corn and soybean yields from USDA-NASS statistics, ²⁰ and weather data from the PRISM Climate Group (PRISM 2022). For the Tier 1 method, a linear-time series model is used to estimate emissions for 2021 without surrogate data. In addition, the linear time series model is used to estimate emissions data for 2018 to 2021 for other organic N amendments (i.e., commercial organic fertilizer) due to a gap in the activity data during the latter part of the time series (TVA 1991 through 1994; AAPFCO 1995 through 2022). See Box 5-4 for more information about the splicing method. Emission estimates for years with imputed data will be recalculated in future Inventory reports when new NRI data and other organic amendment N data are available.

5-38 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

¹⁹ A small proportion of the major commodity crop production, such as corn and wheat, is included in the Tier 1 analysis because these crops are rotated with other crops or land uses (e.g., forest lands) that are not simulated by DayCent.

²⁰ See https://quickstats.nass.usda.gov/.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 501 of 1050 PageID 3949

Box 5-4: Data Splicing Method

An approach to extend the time series is needed for Agricultural Soil Management because there are typically activity data gaps at the end of the time series. This is mainly because the NRI survey program, which provides critical information for estimating greenhouse gas emissions and removals, does not release data every year.

Splicing methods have been used to impute missing data at the end of the emission time series for both the Tier 1 and 3 methods. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to estimate emissions based on the emissions data that has been compiled using the inventory methods described in this section. The model to extend the time series is given by the equation:

$$Y = X\beta + \varepsilon$$
,

where Y is the response variable (e.g., soil nitrous oxide), $X\beta$ for the Tier 3 method contains specific surrogate data depending on the response variable, and ϵ is the remaining unexplained error. Models with a variety of surrogate data were tested, including commodity statistics, weather data, or other relevant information. The term $X\beta$ for the Tier 1 method only contains year as a predictor of emission patterns over the time series (change in emissions per year), and therefore, is a linear time series model with no surrogate data. Parameters are estimated using standard statistical techniques, and used in the model described above to predict the missing emissions data.

A critical issue with splicing methods is to account for the additional uncertainty introduced by predicting emissions without compiling the full inventory. Specifically, uncertainty will increase for years with imputed estimates based on the splicing methods, compared to those years in which the full inventory is compiled. This additional uncertainty is quantified within the model framework using a Monte Carlo approach. Consequently, the uncertainty from the original inventory data is combined with the uncertainty in the data splicing model. The approach requires estimating parameters in the data splicing models in each Monte Carlo simulation for the full inventory (i.e., the surrogate data model is refit with the draws of parameters values that are selected in each Monte Carlo iteration, and used to produce estimates with inventory data). Therefore, the data splicing method generates emissions estimates from each surrogate data model in the Monte Carlo analysis, which are used to derive confidence intervals in the estimates for the missing emissions data. Furthermore, the 95 percent confidence intervals are estimated using the 3 sigma rules assuming a unimodal density (Pukelsheim 1994).

Tier 3 Approach for Mineral Cropland Soils

The DayCent biogeochemical model (Parton et al. 1998; Del Grosso et al. 2001 and 2011) is used to estimate direct N₂O emissions from mineral cropland soils that are managed for production of a wide variety of crops (see list in previous section) based on the crop histories in the 2017 NRI (USDA-NRCS 2020), and extended through 2020 using CDL (USDA-NASS 2021). Crops simulated by DayCent are grown on approximately 85 percent of total cropland area in the United States. The model simulates net primary productivity (NPP) using the NASA-CASA production algorithm MODIS Enhanced Vegetation Index (EVI) products, MOD13Q1 and MYD13Q1²¹ (Potter et al. 1993, 2007). The model simulates soil temperature and water dynamics, using daily weather data from a 4-kilometer gridded product developed by the PRISM Climate Group (2022), and soil attributes from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2020). DayCent is used to estimate direct N₂O emissions due to mineral N available from the following sources: (1) application of synthetic fertilizers; (2) application of livestock manure; (3)

-

²¹ NPP is estimated with the NASA-CASA algorithm for most of the cropland that is used to produce major commodity crops in the central United States from 2000 to 2020. Other regions and years prior to 2000 are simulated with a method that incorporates water, temperature, and moisture stress on crop production (see Metherell et al. 1993), but does not incorporate the additional information about crop condition provided with remote sensing data.

retention of crop residues in the field for N-fixing legumes and non-legume crops and subsequent mineralization of N during microbial decomposition (i.e., leaving residues in the field after harvest instead of burning or collecting residues); (4) mineralization of N from decomposition of soil organic matter; and (5) asymbiotic fixation.

Management activity data from several sources supplement the activity data from the NRI. The USDA-NRCS Conservation Effects and Assessment Project (CEAP) provides data on a variety of cropland management activities, and is used to inform the inventory analysis about tillage practices, mineral fertilization, manure amendments, cover crop management, as well as planting and harvest dates (USDA-NRCS 2022; USDA-NRCS 2018; USDA-NRCS 2012). CEAP data are collected at a subset of NRI survey locations, and currently provide management information from approximately 2002 to 2006 and 2013 to 2016. These data are combined with other datasets in an imputation analysis. This imputation analysis is comprised of three steps: a) determine the trends in management activity across the time series by combining information from several datasets (discussed below); b) use Gradient Boosting (Friedman 2001) to determine the likely management practice at a given NRI survey location; and c) assign management practices from the CEAP survey to the specific NRI locations using a predictive mean matching method for certain variables that are adapted to reflect the trending information (Little 1988; van Buuren 2012). Gradient boosting is a machine learning technique used in regression and classification tasks, among others. It combines predictions from multiple weak prediction models and outperforms many complicated machine learning algorithms. It makes the best predictions at specific NRI survey locations or at state or region level models. The predictive mean matching method identifies the most similar management activity recorded in the CEAP surveys that match the prediction from the gradient boosting algorithm. The matching ensures that imputed management activities are realistic for each NRI survey location, and not odd or physically unrealizable results that could be generated by the gradient boosting. There are six complete imputations of the management activity data using these methods.

To determine trends in mineral fertilization and manure amendments, CEAP data are combined with information on fertilizer use and rates by crop type for different regions of the United States from the USDA Economic Research Service. The data collection program was known as the Cropping Practices Surveys through 1995 (USDA-ERS 1997), and is now part of data collection known as the Agricultural Resource Management Surveys (ARMS) (USDA-ERS 2020). Additional data on fertilization practices are compiled through other sources particularly the National Agricultural Statistics Service (USDA-NASS 1992, 1999, 2004). To determine the trends in tillage management, CEAP data are combined with Conservation Technology Information Center data between 1989 and 2004 (CTIC 2004) and OpTIS Data Product²² for 2008 to 2020 (Hagen et al. 2020). The CTIC data are adjusted for long-term adoption of no-till agriculture (Towery 2001). For cover crops, CEAP data are combined with information from USDA Census of Agriculture (USDA-NASS 2012, 2017) and the OpTIS data product²³ (Hagen et al. 2020). It is assumed that cover crop management was minimal prior to 1990 and the rates increased linearly over the decade to the levels of cover crop management in the CEAP survey.

The IPCC method considers crop residue N and N mineralized from soil organic matter as activity data. However, they are not treated as activity data in DayCent simulations because residue production, symbiotic N fixation (e.g., legumes), mineralization of N from soil organic matter, and asymbiotic N fixation are internally generated by the model as part of the simulation. In other words, DayCent accounts for the influence of symbiotic N fixation, mineralization of N from soil organic matter and crop residue retained in the field, and asymbiotic N fixation on N₂O emissions, but these are not model inputs.

The N₂O emissions from crop residues are reduced by approximately 3 percent (the assumed average burned portion for crop residues in the United States) to avoid double counting associated with non-CO2 greenhouse gas emissions from agricultural residue burning. Estimated levels of residue burning are based on state inventory data (ILENR 1993; Oregon Department of Energy 1995; Noller 1996; Wisconsin Department of Natural Resources 1993; Cibrowski 1996).

²² OpTIS data on tillage practices provided by Regrow Agriculture, Inc.

²³ OpTIS data on cover crop management provided by Regrow Agriculture, Inc.

Case 5:23-cv-00304-H

Uncertainty in the emission estimates from DayCent is associated with input uncertainty due to missing management data in the NRI survey that is imputed from other sources; model uncertainty due to incomplete specification of C and N dynamics in the DayCent model parameters and algorithms; and sampling uncertainty associated with the statistical design of the NRI survey. To assess input uncertainty, C and N dynamics at each NRI survey location are simulated six times using the imputation product and other model driver data. Uncertainty in parameterization and model algorithms are determined using a structural uncertainty estimator derived from fitting a linear mixed-effect model (Ogle et al. 2007; Del Grosso et al. 2010). Sampling uncertainty is assessed using NRI replicate sampling weights. These data are combined in a Monte Carlo stochastic simulation with 1,000 iterations for 1990 through 2020. For each iteration, there is a random selection of management data from the imputation product (select one of the six imputations), random selection of parameter values and random effects for the linear mixed-effect model (i.e., structural uncertainty estimator), and random selection of a set of survey weights from the replicates associated with the NRI survey design.

In order to ensure time-series consistency, the DayCent model is applied from 1990 to 2020, and a linear extrapolation method is used to approximate emissions for 2021 based on the pattern in emissions data from 1990 to 2020 (See Box 5-4). The pattern is determined using a linear regression model with moving-average (ARMA) errors. Linear extrapolation is a standard data splicing method for approximating missing values at the end of an inventory time series (IPCC 2006). The time series will be updated with the Tier 3 method in the future as new activity data are incorporated into the analysis.

Nitrous oxide emissions from managed agricultural lands are the result of interactions among anthropogenic activities (e.g., N fertilization, manure application, tillage) and other driving variables, such as weather and soil characteristics. These factors influence key processes associated with N dynamics in the soil profile, including immobilization of N by soil microbial organisms, decomposition of organic matter, plant uptake, leaching, runoff, and volatilization, as well as the processes leading to N₂O production (nitrification and denitrification). It is not possible to partition N₂O emissions into each anthropogenic activity directly from model outputs due to the complexity of the interactions (e.g., N₂O emissions from synthetic fertilizer applications cannot be distinguished from those resulting from manure applications). To approximate emissions by activity, the amount of synthetic N fertilizer added to the soil, or mineral N made available through decomposition of soil organic matter and plant litter, as well as asymbiotic fixation of N from the atmosphere, is determined for each N source and then divided by the total amount of mineral N in the soil according to the DayCent model simulation. For 2021, the contribution of each N source is based on the average of values that are estimated for 2018 to 2020. The percentages are then multiplied by the total of direct N₂O emissions in order to approximate the portion attributed to N management practices. This approach is only an approximation because it assumes that all N made available in soil has an equal probability of being released as N₂O, regardless of its source, which is unlikely to be the case (Delgado et al. 2009). However, this approach allows for further disaggregation of emissions by source of N, which is valuable for reporting purposes and is analogous to the reporting associated with the IPCC (2006) Tier 1 method, in that it associates portions of the total soil N2O emissions with individual sources of N.

Tier 1 Approach for Mineral Cropland Soils

The IPCC (2006) Tier 1 methodology is used to estimate direct N_2O emissions for mineral cropland soils that are not simulated by DayCent (e.g., DayCent has not been parametrized to simulate all crop types and some soil types such as *Histosols*). For the Tier 1 method, estimates of direct N_2O emissions from N applications are based on mineral soil N that is made available from the following practices: (1) the application of synthetic commercial fertilizers; (2) application of managed manure and non-manure commercial organic fertilizers; and (3) decomposition and mineralization of nitrogen from above- and below-ground crop residues in agricultural fields (i.e., crop biomass that is not harvested). Non-manure commercial organic amendments are only included in the Tier 1 analysis because these data are not available at the county-level, which is necessary for the DayCent simulations. Consequently, all commercial organic fertilizer, as well as manure that is not added to crops in the DayCent simulations, are included in the Tier 1 analysis. The following sources are used to derive activity data:

- A process-of-elimination approach is used to estimate synthetic N fertilizer additions for crop areas that are not simulated by DayCent. The total amount of fertilizer used on farms has been estimated at the county-level by the USGS using sales records from 1990 to 2012 (Brakebill and Gronberg 2017). For 2013 through 2017, fertilizer sales data from AAPFCO (AAPFCO 2013 through 2022) 24 after adjusting for the proportion of on-farm application to determine the amount applied to crops. The amount of fertilizer applied after 2017 is estimated using the data splicing method described in Box 5-4 for the linear time series model. Then the portion of fertilizer applied to crops and grasslands simulated by DayCent is subtracted from the on-farm sales data (see Tier 3 Approach for Mineral Cropland Soils and Direct N2O Emissions from Grassland Soils sections for information on data sources), and the remainder of the total fertilizer used on farms is assumed to be applied to crops that are not simulated by DayCent. At a minimum, 3 percent of state-level on-farm fertilizer sales are assumed to be applied to cropland in the Tier 1 method.
- Similarly, a process-of-elimination approach is used to estimate manure N additions for crops that are not simulated by DayCent. The total amount of manure available for land application to soils has been estimated with methods described in the Manure Management section (Section 5.2) and annex (Annex 3.11). The amount of manure N applied in the Tier 3 approach to crops and grasslands is subtracted from total annual manure N available for land application (see Tier 3 Approach for Mineral Cropland Soils and Direct N2O Emissions from Grassland Soils sections for information on data sources). This difference is assumed to be applied to crops that are not simulated by DayCent.
- Commercial organic fertilizer additions are based on organic fertilizer consumption statistics through 2017²⁵, which are converted from mass of fertilizer to units of N using average organic fertilizer N content, ranging between 2.3 to 4.2 percent across the time series (TVA 1991 through 1994; AAPFCO 1995 through 2022). Commercial fertilizers include dried manure and biosolids (i.e., treated sewage sludge), but the amounts are removed from the commercial fertilizer data to avoid double counting 26 with the manure N dataset described above and the biosolids (i.e., treated sewage sludge) amendment data discussed later in this section.
- Crop residue N is derived by combining amounts of above- and below-ground biomass, which are determined based on NRI crop area data (USDA-NRCS 2020), as extended using the CDL data (USDA-NASS 2021), crop production yield statistics (USDA-NASS 2022), dry matter fractions (IPCC 2006), linear equations to estimate above-ground biomass given dry matter crop yields from harvest (IPCC 2006), ratios of below-to-above-ground biomass (IPCC 2006), and N contents of the residues (IPCC 2006). N inputs from residue were reduced by 3 percent to account for average residue burning portions in the United States.

The total amounts of soil mineral N from applied synthetic and organic fertilizers, manure N additions and crop residues are multiplied by the IPCC (2006) default emission factor to derive an estimate of direct N₂O emissions using the Tier 1 method. Further elaboration on the methodology and data used to estimate N₂O emissions from mineral soils are described in Annex 3.12.

In order to ensure time-series consistency, the Tier 1 methods are applied from 1990 to 2020, and a linear extrapolation method is used to approximate emissions for 2021 based on the emission patterns between 1990 and 2020 (See Box 5-4). The exceptions include crop residue N which is estimated using the Tier 1 method for 1990 to 2021 with no linear extrapolation, and other organic N fertilizers (i.e., commercial fertilizers), which are

²⁴ The fertilizer consumption data in AAPFCO are recorded in "fertilizer year" totals, (i.e., July to June), but are converted to calendar year totals. This is done by assuming that approximately 35 percent of fertilizer usage occurred from July to December and 65 percent from January to June (TVA 1992b).

 $^{^{25}}$ Soil N_2O emissions are imputed using data splicing methods for commercial fertilizers, i.e., other organic fertilizers, after 2017 because the activity data are not available.

²⁶ Commercial organic fertilizers include dried blood, tankage, compost, and other, but the dried manure and biosolids (i.e., treated sewage sludge) are also included in other datasets in this Inventory. Consequently, the proportions of dried manure and biosolids, which are provided in the reports (TVA 1991 through 1994; AAPFCO 1995 through 2022), are used to estimate the N amounts in dried manure and biosolids. To avoid double counting, the resulting N amounts for dried manure and biosolids are subtracted from the total N in commercial organic fertilizers before estimating emissions using the Tier 1 method.

estimated with linear time series model for 2018 to 2021 due to a gap in the activity data during the latter part of the time series (TVA 1991 through 1994; AAPFCO 1995 through 2022). For the extrapolation, the emission pattern is determined using a linear regression model with moving-average (ARMA) errors. Linear extrapolation is a standard data splicing method for approximating missing values at the end of an inventory time series (IPCC 2006). As with the Tier 3 method, the time series that is based on the splicing methods will be recalculated in a future Inventory report with updated activity data.

Tier 1 and 3 Approaches from Mineral Grassland Soils

As with N₂O emissions from croplands, the Tier 3 process-based approaching with application of the DayCent model and Tier 1 method described in IPCC (2006) are combined to estimate emissions from non-federal grasslands and PRP manure N additions for federal grasslands, respectively. Grassland includes pasture and rangeland that produce grass or mixed grass/legume forage primarily for livestock grazing. Rangelands are extensive areas of native grassland that are not intensively managed, while pastures are seeded grassland (possibly following tree removal) that may also have additional management, such as irrigation, fertilization, or interseeding legumes. DayCent is used to simulate N₂O emissions from NRI survey locations (USDA-NRCS 2020) on nonfederal grasslands resulting from manure deposited by livestock directly onto pastures and rangelands (i.e., PRP manure), N fixation from legume seeding, managed manure amendments (i.e., manure other than PRP manure such as daily spread or manure collected from other animal waste management systems such as lagoons and digesters), and synthetic fertilizer application. Other N inputs are simulated within the DayCent framework, including N input from mineralization due to decomposition of soil organic matter and N inputs from senesced grass litter, as well as asymbiotic fixation of N from the atmosphere. The simulations used the same weather, soil, and synthetic N fertilizer data as discussed under the Tier 3 Approach in the Mineral Cropland Soils section. Synthetic N fertilization rates are based on data from the Carbon Sequestration Rural Appraisals (CSRA) conducted by the USDA-NRCS (USDA-NRCS, unpublished data). The CSRA was a solicitation of expert knowledge from USDA-NRCS staff throughout the United States to support the Inventory. Biological N fixation is simulated within DayCent, and therefore is not an input to the model.

Manure N deposition from grazing animals in PRP systems (i.e., PRP manure N) is a key input of N to grasslands. The amounts of PRP manure N applied on non-federal grasslands for each NRI survey location are based on the amount of N excreted by livestock in PRP systems that is estimated in the Manure Management section (See Section 5.2 and Annex 3.11). The total amount of N excreted in each county is divided by the grassland area to estimate the N input rate associated with PRP manure. The resulting rates are a direct input into the DayCent simulations. The N input is subdivided between urine and dung based on a 50:50 split. DayCent simulations of nonfederal grasslands accounted for approximately 71 percent of total PRP manure N in aggregate across the country.²⁷ The remainder of the PRP manure N in each state is assumed to be excreted on federal grasslands, and the N₂O emissions are estimated using the IPCC (2006) Tier 1 method.

Biosolids (i.e., treated sewage sludge) are assumed to be applied on grasslands.²⁸ Application of biosolids is estimated from data compiled by EPA (1993, 1999, 2003), McFarland (2001), and NEBRA (2007) (see Section 7.2 Wastewater Treatment for a detailed discussion of the methodology for estimating treated sewage sludge available for land application application). Biosolids data are only available at the national scale, and it is not possible to associate application with specific soil conditions and weather at NRI survey locations. Therefore, DayCent could not be used to simulate the influence of biosolids on N₂O emissions from grassland soils, and consequently, emissions from biosolids are estimated using the IPCC (2006) Tier 1 method.

²⁷ A small amount of PRP N (less than 1 percent) is deposited in grazed pasture that is in rotation with annual crops, and is reported in the grassland N2O emissions.

Agriculture 5-43

²⁸ A portion of biosolids may be applied to croplands, but there is no national dataset to disaggregate the amounts between cropland and grassland.

Soil N_2O emission estimates from DayCent are adjusted using a structural uncertainty estimator accounting for uncertainty in model algorithms and parameter values (Del Grosso et al. 2010). There is also sampling uncertainty for the NRI survey that is propagated with replicate sampling weights associated with the survey. N_2O emissions for the PRP manure N deposited on federal grasslands and applied biosolids N are estimated using the Tier 1 method by multiplying the N input by the default emission factor. Emissions from manure N are estimated at the state level and aggregated to the entire country, but emissions from biosolids N are calculated exclusively at the national scale. Further elaboration on the methodology and data used to estimate N_2O emissions from mineral soils are described in Annex 3.12.

Soil N_2O emissions and 95 percent confidence intervals are estimated for each year between 1990 and 2020 based on the Tier 1 and 3 methods, except for biosolids (discussed below). In order to ensure time-series consistency, emissions from 2021 are estimated using a splicing method as described in Box 5-4, with a linear extrapolation based on the emission patterns in the 1990 to 2020 data. Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). As with croplands, estimates for 2021 will be recalculated in a future Inventory when the activity data are updated. Biosolids application data are compiled through 2021 in this Inventory, and therefore soil N_2O emissions and confidence intervals are estimated using the Tier 1 method for all years without application of the splicing method.

Tier 1 Approach for Drainage of Organic Soils in Croplands and Grasslands

The IPCC (2006) Tier 1 method is used to estimate direct N₂O emissions due to drainage of organic soils in croplands and grasslands at a state scale. State-scale estimates of the total area of drained organic soils are obtained from the 2017 NRI (USDA-NRCS 2020) using soils data from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2020). Temperature data from the PRISM Climate Group (PRISM 2022) are used to subdivide areas into temperate and tropical climates according to the climate classification from IPCC (2006). To estimate annual emissions, the total temperate area is multiplied by the IPCC default emission factor for temperate regions, and the total tropical area is multiplied by the IPCC default emission factor for tropical regions (IPCC 2006).

Total Direct N₂O Emissions from Cropland and Grassland Soils

Annual direct emissions from the Tier 1 and 3 approaches for mineral and drained organic soils occurring in both croplands and grasslands are summed to obtain the total direct N_2O emissions from agricultural soil management (see Table 5-16 and Table 5-17). Further elaboration on the methodology and data used to estimate soil N_2O emissions are described in Annex 3.12.

Indirect N₂O Emissions Associated with Nitrogen Management in Cropland and Grasslands

Indirect N₂O emissions occur when synthetic N applied or made available through anthropogenic activity is transported from the soil either in gaseous or aqueous forms and later converted into N₂O. There are two pathways leading to indirect emissions. The first pathway results from volatilization of N as NO_x and NH₃ following application of synthetic fertilizer, organic amendments (e.g., manure, biosolids), and deposition of PRP manure. Nitrogen made available from mineralization of soil organic matter and residue, including N incorporated into crops and forage from symbiotic N fixation, and input of N from asymbiotic fixation also contributes to volatilized N emissions. Volatilized N can be returned to soils through atmospheric deposition, and a portion of the deposited N is emitted to the atmosphere as N₂O. The second pathway occurs via leaching and runoff of soil N (primarily in the form of NO₃⁻¹) that is made available through anthropogenic activity on managed lands, including organic and synthetic fertilization, organic amendments, mineralization of soil organic matter and residue, and inputs of N into the soil from asymbiotic fixation. The NO₃⁻¹ is subject to denitrification in water bodies, which leads to N₂O emissions. Regardless of the eventual location of the indirect N₂O emissions, the emissions are assigned to the original source of the N for reporting purposes, which here includes croplands and grasslands.

Tier 1 and 3 Approaches for Indirect N_2O Emissions from Atmospheric Deposition of Volatilized N

The Tier 3 DayCent model and IPCC (2006) Tier 1 methods are combined to estimate the amount of N that is volatilized and eventually emitted as N₂O. DayCent is used to estimate N volatilization for land areas whose direct emissions are simulated with DayCent (i.e., most commodity and some specialty crops and most grasslands). The N inputs included are the same as described for direct N₂O emissions in the Tier 3 Approach for Mineral Cropland and Grassland Soils sections. Nitrogen volatilization from all other areas is estimated using the Tier 1 method with default IPCC fractions for N subject to volatilization (i.e., synthetic and manure N on croplands not simulated by DayCent, other organic N inputs (i.e., commercial fertilizers), PRP manure N excreted on federal grasslands, and biosolids [i.e., treated sewage sludge] application on grasslands).

The IPCC (2006) default emission factor is multiplied by the amount of volatilized N generated from DayCent and Tier 1 methods to estimate indirect N_2O emissions occurring with re-deposition of the volatilized N from 1990 to 2020 (see Table 5-19). A linear extrapolation data splicing method, described in Box 5-4, is applied to estimate emissions from 2021 based on the emission patterns from 1990 to 2020. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Further elaboration on the methodology and data used to estimate indirect N_2O emissions are described in Annex 3.12.

Tier 1 and 3 Approaches for Indirect N₂O Emissions from Leaching/Runoff

As with the calculations of indirect emissions from volatilized N, the Tier 3 DayCent model and IPCC (2006) Tier 1 method are combined to estimate the amount of N that is subject to leaching and surface runoff into water bodies, and eventually emitted as N₂O. DayCent is used to simulate the amount of N transported from lands in the Tier 3 Approach. Nitrogen transport from all other areas is estimated using the Tier 1 method and the IPCC (2006) default factor for the proportion of N subject to leaching and runoff associated with N applications on croplands that are not simulated by DayCent, applications of biosolids on grasslands, other organic N fertilizer applications, crop residue N inputs, and PRP manure N excreted on federal grasslands.

For both the DayCent Tier 3 and IPCC (2006) Tier 1 methods, nitrate leaching is assumed to be an insignificant source of indirect N_2O in cropland and grassland systems in arid regions, as discussed in IPCC (2006). In the United States, the threshold for significant nitrate leaching is based on the potential evapotranspiration (PET) and rainfall amount, similar to IPCC (2006), and is assumed to be negligible in regions where the amount of precipitation does not exceed 80 percent of PET (Note: All irrigated systems are assumed to have significant amounts of leaching of N even in drier climates).

For leaching and runoff data estimated by the Tier 3 and Tier 1 approaches, the IPCC (2006) default emission factor is used to estimate indirect N₂O emissions that occur in groundwater and waterways (see Table 5-19). Further elaboration on the methodology and data used to estimate indirect N₂O emissions are described in Annex 3.12.

In order to ensure time-series consistency, indirect soil N_2O emissions are estimated using the Tier 1 and 3 approaches from 1990 to 2020 and then a linear extrapolation data splicing method, described in Box 5-4, is applied to estimate emissions from 2021 based on the emission patterns from 1990 to 2020. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the direct N_2O emissions, the time series will be recalculated in a future Inventory when new activity data are incorporated into the analysis.

Uncertainty

Uncertainty is estimated for each of the following five components of N₂O emissions from agricultural soil management: (1) direct emissions simulated by DayCent; (2) the components of indirect emissions (N volatilized and leached or runoff) simulated by DayCent; (3) direct emissions estimated with the IPCC (2006) Tier 1 method; (4) the components of indirect emissions (N volatilized and leached or runoff) estimated with the IPCC (2006) Tier 1 method; and (5) indirect emissions estimated with the IPCC (2006) Tier 1 method. Uncertainty in direct emissions as well as the components of indirect emissions that are estimated from DayCent are derived from a Monte Carlo

Analysis (consistent with IPCC Approach 2), addressing uncertainties in model inputs and structure (i.e., algorithms and parameterization) (Del Grosso et al. 2010). For 2021 (and 2018 to 2021 for other organic N fertilizers), there is additional uncertainty propagated through the Monte Carlo Analysis associated with the splicing method (See Box 5-4) except for the Tier 1 method for biosolids and crop residue N inputs, which do not use the data splicing method for 2021.

Simple error propagation methods (IPCC 2006) are used to derive confidence intervals for direct emissions estimated with the IPCC (2006) Tier 1 method, the proportion of volatilization and leaching or runoff estimated with the IPCC (2006) Tier 1 method, and indirect N_2O emissions. Uncertainty in the splicing method is also included in the error propagation for 2021 (see Box 5-4). Additional details on the uncertainty methods are provided in Annex 3.12.

Table 5-20 shows the combined uncertainty for soil N_2O emissions. The estimated direct soil N_2O emissions range from 35 percent below to 72 percent above the 2021 emission estimate of 264.7 MMT CO_2 Eq. The combined uncertainty for indirect soil N_2O emissions ranges from 60 percent below to 131 percent above the 2021 estimate of 29.3 MMT CO_2 Eq.

Table 5-20: Quantitative Uncertainty Estimates of N₂O Emissions from Agricultural Soil Management in 2021 (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertai	nty Range Rela	ntive to Emissic	on Estimate
		(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%	%)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Direct Soil N ₂ O Emissions	N ₂ O	264.7	173.2	456.4	-35%	72%
Indirect Soil N ₂ O Emissions	N_2O	29.3	11.9	67.7	-60%	131%

Note: Due to lack of data, uncertainties in PRP manure N production, other organic N fertilizer amendments, and biosolids (i.e., treated sewage sludge) amendments to soils are currently treated as certain. These sources of uncertainty will be included in a future Inventory (IPCC 2006).

Additional uncertainty is associated with an incomplete estimation of N_2O emissions from managed croplands and grasslands in Hawaii and Alaska. The Inventory currently includes the N_2O emissions from managed manure and PRP N, and biosolid additions for Alaska and managed manure and PRP N, biosolid additions, and crop residue for Hawaii. Land areas used for agriculture in Alaska and Hawaii are small relative to major crop commodity states in the conterminous United States, so the emissions are likely to be minor for the other sources of N (e.g., synthetic fertilizer and crop residue inputs). Regardless, there is a planned improvement to include the additional sources of emissions in a future inventory.

QA/QC and Verification

General (Tier 1) and category-specific (Tier 2) QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. DayCent results for N₂O emissions and NO₃⁻ leaching are compared with field data representing various cropland and grassland systems, soil types, and climate patterns (Del Grosso et al. 2005; Del Grosso et al. 2008), and further evaluated by comparing the model results to emission estimates produced using the IPCC (2006) Tier 1 method for the same sites. Nitrous oxide measurement data for cropland are available for 79 sites with 829 observations of management practice effects, and measurement data for grassland are available for 11 sites with 17 observations of management practice effects. Nitrate leaching data are available for 9 sites, representing 230 observations of management practice effects. In general, DayCent predicted N₂O emission and nitrate leaching for these sites reasonably well. See Annex 3.12 for more detailed information about the comparisons.

Databases containing input data and probability distribution functions required for DayCent simulations of croplands and grasslands and unit conversion factors have been checked, in addition to the program scripts that are used to run the Monte Carlo uncertainty analysis. Major errors were found in the synthetic N application rates for the Tier 3 method, with overapplication based on comparisons to the synthetic fertilizer sales data. Moreover, there was a miscalculation of the synthetic fertilizer additions for the Tier 1 method, leading to negative emission estimates. An error was also corrected in the uncertainty analysis for the Tier 1 method in which the distribution for the default emission factors had been truncated. Other errors were identified in the application of the structural uncertainty estimator for direct and indirect soil N₂O emissions. All of these errors were corrected. Links between spreadsheets have also been checked, updated, and corrected as needed.

Recalculations Discussion

Several improvements have been implemented in this Inventory leading to the need for recalculations. These improvements included a) incorporating new USDA-NRCS NRI data through 2017; b) extending the time series for crop histories through 2020 using USDA-NASS CDL data; c) incorporating USDA-NRCS CEAP survey data for 2013 to 2016; d) incorporating cover crop and tillage management information from the OpTIS remote-sensing data product from 2008 to 2020; e) modifying the statistical imputation method for the management activity data associated with about tillage practices, mineral fertilization, manure amendments, cover crop management, planting and harvest dates using gradient boosting instead of an artificial neural network; f) updating time series of synthetic N fertilizer sales data, PRP N and manure N available for application to soils; g) constraining synthetic N fertilization and manure N applications in the Tier 3 method at the state scale rather than the national scale; h) recalibrating the soil C module in the DayCent model using Bayesian methods; and i) application of global warming potential values from the IPCC Fifth Assessment Report (AR5) (IPCC 2013). The updated global warming potential (GWP) for calculating CO₂-equivalent emissions N₂O (updated from 298 to 265) reflects the 100-year GWPs provided in the IPCC AR5. The previous Inventory used 100-year GWPs provided in the IPCC Fourth Assessment Report (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

These combined impact from these changes resulted in an average decrease in emissions of 24.5 MMT CO₂ Eq., or 8 percent, from 1990 to 2020 relative to the previous Inventory.

Planned Improvements

Several planned improvements are underway associated with improving the DayCent biogeochemical model. These improvements include a better representation of plant phenology, particularly senescence events following grain filling in crops. In addition, crop parameters associated with temperature and water stress effects on plant production will be improved in DayCent with additional model calibration. In addition, there is an improvement underway to calibrate the N submodule in order to more accurately predict N-gas losses and nitrate leaching rates. Experimental study sites will continue to be added for quantifying model structural uncertainty, with priority given to studies that have continuous (daily) measurements of N₂O (e.g., Scheer et al. 2013). In addition, improvements are underway to simulate crop residue burning in the DayCent model based on the amount of crop residues burned according to the data that is used in the Field Burning of Agricultural Residues source category (see section 5.7).

For Tier 1, there is a planned improvement to include all sources of N for Alaska and Hawaii in the Inventory for agricultural soil management, which currently only addresses managed manure N and PRP N, and biosolid additions for grasslands in both states, in addition to crop residue N inputs for Hawaii. There is also an improvement to incorporate the Tier 1 emission factor for N₂O emissions from drained organic soils by using the revised factors in the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands (IPCC 2013). There is a planned improvement for the Tier 1 method associated with estimating soil N₂O emissions from N mineralization due to soil organic matter decomposition that is accelerated with land use

conversions to cropland and grassland. Lastly, a review of available data on biosolids (i.e., treated sewage sludge) application will also be undertaken to improve the distribution of biosolids application on croplands, grasslands and settlements.

Other suggested improvements identified through public review are being evaluated for future Inventory submissions. Improvements are expected to be completed for the next Inventory (i.e., 2024 submission to the UNFCCC, 1990 through 2022 Inventory). However, the timeline may be extended if there are insufficient resources to fund all or part of these planned improvements

5.5 Liming (CRF Source Category 3G)

Crushed limestone ($CaCO_3$) and dolomite ($CaMg(CO_3)_2$) are added to soils by land managers to increase soil pH (i.e., to reduce acidification). Carbon dioxide emissions occur as these compounds react with hydrogen ions in soils. The rate of degradation of applied limestone and dolomite depends on the soil conditions, soil type, climate regime, and whether limestone or dolomite is applied. Emissions from limestone and dolomite that are used in industrial processes (e.g., cement production, glass production, etc.) are reported in the IPPU chapter. Emissions from liming of soils have fluctuated between 1990 and 2021 in the United States, ranging from 2.2 MMT CO_2 Eq. to 6.0 MMT CO_2 Eq. across the entire time series. In 2021, liming of soils in the United States resulted in emissions of 3.0 MMT CO_2 Eq. (0.8 MMT C), representing a 35 percent decrease in emissions since 1990 (see Table 5-21 and Table 5-22). The trend is driven by variation in the amount of limestone and dolomite applied to soils over the time period.

Table 5-21: Emissions from Liming (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Limestone	4.1	3.9	2.9	2.0	1.9	2.5	2.6
Dolomite	0.6	0.4	0.2	0.2	0.3	0.4	0.4
Total	4.7	4.4	3.1	2.2	2.2	2.9	3.0

Note: Totals may not sum due to independent rounding.

Table 5-22: Emissions from Liming (MMT C)

Source	1990	2005	2017	2018	2019	2020	2021
Limestone	1.1	1.1	0.8	0.6	0.5	0.7	0.7
Dolomite	0.2	0.1	+	0.1	0.1	0.1	0.1
Total	1.3	1.2	0.8	0.6	0.6	0.8	0.8

+ Does not exceed 0.05 MMT C

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

Carbon dioxide emissions from application of limestone and dolomite to soils were estimated using a Tier 2 methodology consistent with IPCC (2006). The annual amounts of limestone and dolomite, which are applied to soils (see Table 5-23), were multiplied by CO₂ emission factors from West and McBride (2005). These country-specific emission factors (0.059 metric ton C/metric ton limestone, 0.064 metric ton C/metric ton dolomite) are lower than the IPCC default emission factors because they account for the portion of carbonates that are transported from soils through hydrological processes and eventually deposited in ocean basins (West and McBride 2005). This analysis of lime dissolution is based on studies in the Mississippi River basin, where the vast majority of lime application occurs in the United States (West 2008). Moreover, much of the remaining lime

application is occurring under similar precipitation regimes, and so the emission factors are considered a reasonable approximation for all lime application in the United States (West 2008) (See Box 5-5).

The annual application rates of limestone and dolomite were derived from estimates and industry statistics provided in the U.S. Geological Survey (USGS) Minerals Yearbook (Tepordei 1993 through 2006; Willett 2007a, 2007b, 2009, 2010, 2011a, 2011b, 2013a, 2014, 2015, 2016, 2017, 2020a, 2022a, 2022b, 2022c), as well as preliminary data that will eventually be published in the Minerals Yearbook for the latter part of the time series (Willett 2022d). Data for the final year of the inventory is based on the Mineral Industry Surveys, as discussed below (USGS 2022). The U.S. Geological Survey (USGS; U.S. Bureau of Mines prior to 1997) compiled production and use information through surveys of crushed stone manufacturers. However, manufacturers provided different levels of detail in survey responses so the estimates of total crushed limestone and dolomite production and use were divided into three components: (1) production by end-use, as reported by manufacturers (i.e., "specified" production); (2) production reported by manufacturers without end-uses specified (i.e., "unspecified" production); and (3) estimated additional production by manufacturers who did not respond to the survey (i.e., "estimated" production).

Box 5-5: Comparison of the Tier 2 U.S. Inventory Approach and IPCC (2006) Default Approach

Emissions from liming of soils were estimated using a Tier 2 methodology based on emission factors specific to the United States that are lower than the IPCC (2006) default emission factors. Most lime application in the United States occurs in the Mississippi River basin, or in areas that have similar soil and rainfall regimes as the Mississippi River basin. Under these conditions, a significant portion of dissolved agricultural lime leaches through the soil into groundwater. Groundwater moves into channels and is transported to larger rives and eventually the ocean where CaCO₃ precipitates to the ocean floor (West and McBride 2005). The U.S.-specific emission factors (0.059 metric ton C/metric ton limestone and 0.064 metric ton C/metric ton dolomite) are about half of the IPCC (2006) emission factors (0.12 metric ton C/metric ton limestone and 0.13 metric ton C/metric ton dolomite). For comparison, the 2021 U.S. emission estimate from liming of soils is 3.0 MMT CO2 Eq. using the country-specific factors. In contrast, emissions would be estimated at 6.2 MMT CO₂ Eq. using the IPCC (2006) default emission factors.

Data on "specified" limestone and dolomite amounts were used directly in the emission calculation because the end use is provided by the manufacturers and can be used to directly determine the amount applied to soils. However, it is not possible to determine directly how much of the limestone and dolomite is applied to soils for manufacturer surveys in the "unspecified" and "estimated" categories. For these categories, the amounts of crushed limestone and dolomite applied to soils were determined by multiplying the percentage of total "specified" limestone and dolomite production that is applied to soils, by the total amounts of "unspecified" and "estimated" limestone and dolomite production. In other words, the proportion of total "unspecified" and "estimated" crushed limestone and dolomite that was applied to soils is proportional to the amount of total "specified" crushed limestone and dolomite that was applied to soils.

In addition, data were not available for 1990, 1992, and 2021 on the fractions of total crushed stone production that were limestone and dolomite, and on the fractions of limestone and dolomite production that were applied to soils. To estimate the 1990 and 1992 data, a set of average fractions were calculated using the 1991 and 1993 data. These average fractions were applied to the quantity of "total crushed stone produced or used" reported for 1990 and 1992 in the 1994 Minerals Yearbook (Tepordei 1996). To estimate 2021 data, 2020 fractions were applied to the 2021 estimates of total crushed stone. The basis for these estimates is from the USGS Mineral Industry Surveys: Crushed Stone and Sand and Gravel in the First Quarter of 2022 (USGS 2022).

The primary source for limestone and dolomite activity data is the Minerals Yearbook, published by the Bureau of Mines through 1996 and by the USGS from 1997 to the present. In 1994, the "Crushed Stone" chapter in the Minerals Yearbook began rounding (to the nearest thousand metric tons) quantities for total crushed stone produced or used. It then reported revised (rounded) quantities for each of the years from 1990 to 1993. In order to minimize the inconsistencies in the activity data, these revised production numbers have been used in all of the subsequent calculations.

Table 5-23: Applied Minerals (MMT)

Mineral	1990	2005	2017	2018	2019	2020	2021
Limestone	19.0	18.1	13.4	9.4	8.9	11.7	12.2
Dolomite	2.4	1.9	0.7	0.9	1.2	1.6	1.7

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. In addition, the same methods are applied throughout the time series, and the activity data are extended in the last two years of the time series based on proportions of specified, unspecified and estimated agricultural limestone and dolomite so that estimates are consistent with the previous year's data. These years will be recalculated when additional data are available on the amounts of limestone and dolomite that are used for agricultural purposes.

Uncertainty

Uncertainty regarding the amount of limestone and dolomite applied to soils was estimated at ±15 percent with normal densities (Tepordei 2003; Willett 2013b). Analysis of the uncertainty associated with the emission factors included the fraction of lime dissolved by nitric acid versus the fraction that reacts with carbonic acid, and the portion of bicarbonate that leaches through the soil and is transported to the ocean. Uncertainty regarding the time associated with leaching and transport was not addressed in this analysis, but is assumed to be a relatively small contributor to the overall uncertainty (West 2005). The probability distribution functions for the fraction of lime dissolved by nitric acid and the portion of bicarbonate that leaches through the soil were represented as triangular distributions between ranges of zero and 100 percent of the estimates. The uncertainty surrounding these two components largely drives the overall uncertainty. The emission factor distributions were truncated at 0 so that emissions were not less than 0.

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the uncertainty in CO₂ emissions from liming. The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 5-24. Carbon dioxide emissions from carbonate lime application to soils in 2021 were estimated to be between 0.46 and 5.88 MMT CO₂ Eq. at the 95 percent confidence level. This confidence interval represents a range of 85 percent below to 94 percent above the 2021 emission estimate of 3.0 MMT CO₂ Eq. All of the carbon in the carbonate lime applied to agricultural soils is not emitted to the atmosphere due to the dominance of the carbonate lime dissolving in carbonic acid rather than nitric acid (West and McBride 2005).

Table 5-24: Approach 2 Quantitative Uncertainty Estimates for CO₂ Emissions from Liming (MMT CO₂ Eq. and Percent)

Source	Coo	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate					
Source	Gas	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Liming	CO ₂	3.0	0.5	5.9	-85%	94%		

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

A source-specific QA/QC plan for liming has been developed and implemented, consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The quality control effort focused on the Tier 1 procedures for this Inventory.

Quality control uncovered small errors in the national data estimates of total stone sold or used for most years in the inventory time series. These errors were due to changes in the estimates from the original values, which were recalculated and published by USGS in subsequent reports. No other errors were found.

Recalculations Discussion

Limestone and dolomite application data for 2018, 2019, 2020 were updated with the recently acquired data from Willett, J.C. (2022a, 2022b, 2022c), rather than approximated by a ratio method, which was used in the previous Inventory. There were also corrections to the national data estimates of total stone sold or used (both limestone and dolomite) based on quality control. With these revisions, the emissions decreased by an average of 0.5 percent for inventory time series from 1990 to 2020 relative to the previous Inventory.

Urea Fertilization (CRF Source Category 5.6 3H)

The use of urea (CO(NH₂)₂) as a fertilizer leads to greenhouse gas emissions through the release of CO₂ that was fixed during the production of urea. In the presence of water and urease enzymes, urea that is applied to soils as fertilizer is converted into ammonium (NH₄⁺), hydroxyl ion (OH), and bicarbonate (HCO₃⁻). The bicarbonate then evolves into CO2 and water. Emissions from urea fertilization in the United States were 5.2 MMT CO2 Eq. (1.4 MMT C) in 2021 (Table 5-25 and Table 5-26). Carbon dioxide emissions have increased by 116 percent between 1990 and 2021 due to an increasing amount of urea that is applied to soils. The variation in emissions across the time series is driven by differences in the amounts of fertilizer applied to soils each year. Carbon dioxide emissions associated with urea that is used for non-agricultural purposes are reported in the IPPU chapter (Section 4.6).

Table 5-25: CO₂ Emissions from Urea Fertilization (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2

Table 5-26: CO₂ Emissions from Urea Fertilization (MMT C)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Fertilization	0.7	1.0	1.3	1.3	1.4	1.4	1.4

Methodology and Time-Series Consistency

Carbon dioxide emissions from the application of urea to agricultural soils were estimated using the IPCC (2006) Tier 1 methodology. The method assumes that C in the urea is released after application to soils and converted to CO₂. The annual amounts of urea applied to croplands (see Table 5-27) were derived from the state-level fertilizer sales data provided in Commercial Fertilizer reports (TVA 1991, 1992, 1993, 1994; AAPFCO 1995 through 2022).²⁹ These amounts were multiplied by the default IPCC (2006) emission factor (0.20 metric tons of C per metric ton of

²⁹ The amount of urea consumed for non-agricultural purposes in the United States is reported in the Industrial Processes and Product Use chapter, Section 4.6 Urea Consumption for Non-Agricultural Purposes.

urea), which is equal to the C content of urea on an atomic weight basis. National estimates from Urea Fertilization also include emissions from Puerto Rico.

Fertilizer sales data are reported in fertilizer years (July previous year through June current year), so a calculation was performed to convert the data to calendar years (January through December). According to monthly fertilizer use data (TVA 1992b), 35 percent of total fertilizer used in any fertilizer year is applied between July and December of the previous calendar year, and 65 percent is applied between January and June of the current calendar year.

Fertilizer sales data for the 2018 through 2021 fertilizer years were not available for this Inventory. Therefore, urea application in the 2018 through 2021 fertilizer years were estimated using a linear, least squares trend of consumption over the data from the previous five years (2013 through 2017) at the state scale. A trend of five years was chosen as opposed to a longer trend as it best captures the current inter-annual variability in consumption. State-level estimates of CO₂ emissions from the application of urea to agricultural soils were summed to estimate total emissions for the entire United States. The fertilizer year data is then converted into calendar year (Table 5-27) data using the method described above.

Table 5-27: Applied Urea (MMT)

	1990	2005	2017	2018	2019	2020	2021
Urea Fertilizera	3.3	4.8	6.6	6.7	6.9	7.0	7.1

^a These numbers represent amounts applied to all agricultural land, including Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Settlements Remaining Settlements, Land Converted to Settlements, Forest Land Remaining Forest Land and Land Converted to Forest Land, as it is not currently possible to apportion the data by land-use/conversion category.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. In addition, the same methods are applied in all years and the activity data are extended using a data splicing method with a linear extrapolation based on the last four years of urea fertilization data to ensure consistency in the time series. These years will be recalculated when additional data are available on urea fertilization.

Uncertainty

An Approach 2 Monte Carlo analysis is conducted as described by the IPCC (2006). The largest source of uncertainty is the default emission factor, which assumes that 100 percent of the C in CO(NH₂)₂ applied to soils is emitted as CO₂. The uncertainty surrounding this factor incorporates the possibility that some of the C may not be emitted to the atmosphere, and therefore the uncertainty range is set from 50 percent emissions to the maximum emission value of 100 percent using a triangular distribution. In addition, urea consumption data have uncertainty that is represented as a normal density. Due to the highly skewed distribution of the resulting emissions from the Monte Carlo uncertainty analysis, the estimated emissions are based on the analytical solution to the equation, and the confidence interval is approximated based on the values at 2.5 and 97.5 percentiles.

Carbon dioxide emissions from urea fertilization of agricultural soils in 2021 are estimated to be between 2.99 and 5.39 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of 43 percent below to 3 percent above the 2021 emission estimate of 5.2 MMT CO_2 Eq. (Table 5-28).

Table 5-28: Quantitative Uncertainty Estimates for CO₂ Emissions from Urea Fertilization (MMT CO₂ Eq. and Percent)

			Uncertainty Range Relative to Emission				
Source	Gas	2021 Emission Estimate	21 Emission Estimate				
		(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%	%)	
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 515 of 1050 PageID 3963

Urea Fertilization CO ₂	5.2	3.0	5.4	-43%	+3%
------------------------------------	-----	-----	-----	------	-----

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

There are additional uncertainties that are not quantified in this analysis. There is uncertainty surrounding the assumptions underlying conversion of fertilizer years to calendar years. These uncertainties are negligible over multiple years because an over- or under-estimated value in one calendar year is addressed with a corresponding increase or decrease in the value for the subsequent year. In addition, there is uncertainty regarding the fate of C in urea that is incorporated into solutions of urea ammonium nitrate (UAN) fertilizer. Emissions of CO₂ from UAN applications to soils are not estimated in the current Inventory (see Planned Improvements).

QA/QC and Verification

A source-specific QA/QC plan for Urea Fertilization has been developed and implemented, consistent with the U.S. Inventory QA/QC plan.

Recalculations Discussion

The new AAPFCO report on urea consumption (2022) provided revisions to previous estimates of urea fertilization for Idaho and Oklahoma in addition to data for all states in 2017. With the new year of data, data splicing methods were used to adjust the fertilization values for 2018 to 2020 based on the most recent 5 years of data (2013 to 2017). These modifications resulted in an average reduction in emissions of 1 percent for 2015 to 2020.

Planned Improvements

A key planned improvement is to incorporate Urea Ammonium Nitrate (UAN) in the estimation of Urea CO₂ emissions. Activity data for UAN have been identified, but additional information is needed to fully incorporate this type of fertilizer into the analysis, which will be completed in a future Inventory.

5.7 Field Burning of Agricultural Residues (CRF Source Category 3F)

Crop production creates large quantities of agricultural crop residues, which farmers manage in a variety of ways. For example, crop residues can be left in the field and possibly incorporated into the soil with tillage; collected and used as fuel, animal bedding material, supplemental animal feed, or construction material; composted and applied to soils; transported to landfills; or burned in the field. The 2006 IPCC Guidelines does not consider field burning of crop residues to be a net source of CO_2 emissions because it is assumed the C released to the atmosphere as CO_2 during burning is reabsorbed during the next growing season by the crop (IPCC 2006). However, crop residue burning is a net source of CH_4 , N_2O , CO, and NO_x , which are released during combustion.

In the United States, field burning of agricultural residues occurs in southeastern states, the Great Plains, and the Pacific Northwest (McCarty 2011). The primary crops that are managed with residue burning include corn, cotton, lentils, rice, soybeans, sugarcane and wheat (McCarty 2009). In 2021, CH₄ and N₂O emissions from field burning of agricultural residues were 0.5 MMT CO₂ Eq. (17 kt) and 0.2 MMT CO₂ Eq. (1 kt), respectively (Table 5-29 and Table 5-30). Annual emissions of CH₄ and N₂O have increased from 1990 to 2021 by 14 percent and 16 percent, respectively. The increase in emissions over time is partly due to higher yielding crop varieties with larger amounts

of residue production and fuel loads, but also linked with an increase in the area burned for some of the crop types.

Table 5-29: CH₄ and N₂O Emissions from Field Burning of Agricultural Residues (MMT CO₂ Eq.)

Gas/Crop Type	1990	2005	2017	2018	2019	2020	2021
CH ₄	0.4	0.5	0.5	0.5	0.5	0.5	0.5
Maize	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Rice	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Wheat	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	+	+	+	+	+	+	+
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+
Soybeans	+	+	+	+	+	+	+
Potatoes	+	+	+	+	+	+	+
Sugarbeets	+	+	+	+	+	+	+
N ₂ O	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Maize	+	+	+	+	+	+	+
Rice	+	+	+	+	+	+	+
Wheat	0.1	0.1	+	+	+	+	+
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	+	+	+	+	+	+	+
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+
Soybeans	+	+	+	+	+	+	+
Potatoes	+	+	+	+	+	+	+

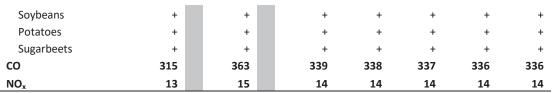
Sugarbeets	+	+	+	+	+	+	+
Total	0.6	0.7	0.7	0.6	0.6	0.6	0.6

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 5-30: CH₄, N₂O, CO, and NO_x Emissions from Field Burning of Agricultural Residues (kt)

Gas/Crop Type	1990	2005	2017	2018	2019	2020	2021
CH ₄	15	17	17	17	17	17	17
Maize	2	4	5	5	5	5	5
Rice	3	3	3	2	3	2	3
Wheat	6	6	5	5	5	5	5
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	1	2	1	1	1	1	1
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+
Soybeans	1	2	2	2	2	2	2
Potatoes	+	+	+	+	+	+	+
Sugarbeets	+	+	+	+	+	+	+
N ₂ O	1	1	1	1	1	1	1
Maize	+	+	+	+	+	+	+
Rice	+	+	+	+	+	+	+
Wheat	+	+	+	+	+	+	+
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	+	+	+	+	+	+	+
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+



+ Does not exceed 0.5 kt.

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

A country-specific Tier 2 method is used to estimate greenhouse gas emissions from field burning of agricultural residues from 1990 to 2014 (for more details comparing the country-specific approach to the IPCC (2006) default approach, see Box 5-6), and a data splicing method with a linear extrapolation is applied to complete the emissions time series from 2015 to 2021. The following equation is used to estimate the amounts of C and N released (R_i , where i is C or N) from burning.

Equation 5-1: Elemental C or N Released through Oxidation of Crop Residues

 $R_i = CP \times RCR \times DMF \times F_i \times FB \times CE$ $FB = \frac{AB}{CAH}$

where,

Crop Production (CP) = Annual production of crop, by state, kt crop production

Residue: Crop Ratio (RCR) = Amount of residue produced per unit of crop production, kt residue/kt crop

production

Dry Matter Fraction (DMF) = Amount of dry matter per unit of residue biomass for a crop, kt residue dry

matter/ kt residue biomass

Fraction C or N (F_i) = Fraction of C or N per unit of dry matter for a crop, kt C or N /kt residue dry

matter

Fraction Burned (FB) = Proportion of residue biomass consumed, unitless

Combustion Efficiency (CE) = Proportion of residue actually burned, unitless

Area Burned (AB) = Total area of crop burned, by state, ha

Crop Area Harvested (CAH) = Total area of crop harvested, by state, ha

Crop production data are available by state and year from USDA (2019) for twenty-one crops that are burned in the conterminous United States, including maize, rice, wheat, barley, oats, other small grains, sorghum, cotton, grass hay, legume hay, peas, sunflower, tobacco, vegetables, chickpeas, dry beans, lentils, peanuts, soybeans, potatoes, and sugarbeets. Crop area data are based on the 2015 National Resources Inventory (NRI) (USDA-NRCS 2018). In order to estimate total crop production, the crop yield data from USDA Quick Stats crop yields is multiplied by the NRI crop areas. The production data for the crop types are presented in Table 5-31. Alaska and Hawaii are not included in the current analysis, but there is a planned improvement to estimate residue burning emissions for these two states in a future Inventory.

³⁰ Sugarcane and Kentucky bluegrass (produced on farms for turf grass installations) may have small areas of burning that are not captured in the sample of locations that were used in the remote sensing analysis (see Planned Improvements).

The amount of elemental C or N released through oxidation of the crop residues is used in the following equation to estimate the amount of CH₄, CO, N₂O, and NO_x emissions (E_g , where g is the specific gas, i.e., CH₄, CO, N₂O, and NO_x) from the field burning of agricultural residues:

Equation 5-2: Emissions from Crop Residue Burning

 $E_g = R_i \times EF_g \times CF$

where,

Emission ratio (EF_a) = emission ratio by gas, g CH₄-C or CO-C/g C released, or g N₂O-N or NO_x-

N/g N released

Conversion Factor (CF) = conversion by molecular weight ratio of CH₄-C to C (16/12), CO-C to C

(28/12), N_2O-N to N (44/28), or NO_x-N to N (30/14)

Box 5-6: Comparison of Tier 2 U.S. Inventory Approach and IPCC (2006) Default Approach

Emissions from field burning of agricultural residues are calculated using a Tier 2 methodology that is based on the method developed by the IPCC/UNEP/OECD/IEA (1997). The rationale for using the IPCC/UNEP/OECD/IEA (1997) approach rather than the method provided in the 2006 IPCC Guidelines is as follows: (1) the equations from both guidelines rely on the same underlying variables (though the formats differ); (2) the IPCC (2006) equation was developed to be broadly applicable to all types of biomass burning, and, thus, is not specific to agricultural residues; (3) the IPCC (2006) method provides emission factors based on the dry matter content rather than emission rates related to the amount of C and N in the residues; and (4) the IPCC (2006) default factors are provided only for four crops (corn, rice, sugarcane, and wheat) while this Inventory includes emissions from twenty-one crops.

A comparison of the methods in the current Inventory and the default IPCC (2006) approach was undertaken for 2014 to determine the difference in estimates between the two approaches. To estimate greenhouse gas emissions from field burning of agricultural residues using the IPCC (2006) methodology, the following equation—cf. IPCC (2006) Equation 2.27—was used with default factors and country-specific values for mass of fuel.

Equation 5-3: Estimation of Greenhouse Gas Emissions from Fire

Emissions (kt) = AB × M_B × C_f × G_{ef} × 10^{-6}

where,

Area Burned (AB) = Total area of crop burned (ha)

Mass of Fuel (M_B) = U.S.- Specific Values using NASS Statistics³¹ (metric tons dry matter)

Combustion Factor (C_f) = IPCC (2006) default combustion factor with fuel biomass consumption

(metric tons dry matter ha⁻¹)

Emission Factor (G_{ef}) = IPCC (2006) emission factor (g kg⁻¹ dry matter burnt)

The IPCC (2006) Tier 1 method approach resulted in 21 percent lower emissions of CH_4 and 44 percent lower emissions of N_2O compared to this Inventory. In summary, the IPCC/UNEP/OECD/IEA (1997) method is considered more appropriate for U.S. conditions because it is more flexible for incorporating country-specific

³¹ NASS yields are used to derive mass of fuel values because IPCC (2006) only provides default values for 4 of the 21 crops included in the Inventory.

data. Emissions are estimated based on specific C and N content of the fuel, which is converted into CH_4 , CO, N_2O and NO_x , compared to IPCC (2006) approach that is based on dry matter rather than elemental composition.

Table 5-31: Agricultural Crop Production (kt of Product)

Crop	1990	2005	2011	2012	2013	2014
Maize	296,065	371,256	399,531	349,739	436,565	453,524
Rice	9,543	11,751	9,890	10,445	10,894	12,380
Wheat	79,805	68,077	61,082	69,388	67,388	62,602
Barley	9,281	5,161	3,891	5,382	4,931	5,020
Oats	5,969	2,646	1,661	1,743	1,806	2,042
Other Small Grains	2,651	2,051	1,259	1,657	1,902	2,492
Sorghum	23,687	14,382	9,196	11,288	18,680	18,436
Cotton	4,605	6,106	5,200	5,357	3,982	4,396
Grass Hay	44,150	49,880	44,670	40,821	45,588	46,852
Legume Hay	90,360	91,819	82,440	71,435	79,669	82,844
Peas	51	660	206	488	599	447
Sunflower	1,015	1,448	820	1,274	987	907
Tobacco	1,154	337	286	466	481	542
Vegetables	0	1,187	1,201	1,973	1,844	2,107
Chickpeas	0	5	+	1	+	+
Dry Beans	467	1,143	1,024	1,260	1,110	1,087
Lentils	0	101	46	95	72	76
Peanuts	1,856	2,176	1,982	2,854	2,072	2,735
Soybeans	56,612	86,980	87,556	85,843	94,756	110,560
Potatoes	18,924	20,026	19,800	19,776	20,234	19,175
Sugarbeets	24,951	25,635	27,345	32,791	31,890	31,737

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq.

Note: The amount of crop production has not been compiled for 2015 to 2021 so a data splicing method is used to estimate emissions for this portion of the time series.

The area burned is determined based on an analysis of remote sensing products (McCarty et al. 2009, 2010, 2011). The presence of fires has been analyzed at 3,600 survey locations in the NRI from 1990 to 2002 with LANDFIRE data products developed from 30 m Landsat imagery (LANDFIRE 2008), and from 2003 through 2014 using 1 km Moderate Resolution Imaging Spectroradiometer imagery (MODIS) Global Fire Location Product (MCD14ML) using combined observations from Terra and Aqua satellites (Giglio et al. 2006). A sample of states are included in the analysis with high, medium and low burning rates for agricultural residues, including Arkansas, California, Florida, Indiana, Iowa and Washington. The area burned is determined directly from the analysis for these states.

For other states within the conterminous United States, the area burned for the 1990 through 2014 portion of the time series is estimated from a logistical regression model that has been developed from the data collected from the remote sensing products for the six states. The logistical regression model is used to predict occurrence of fire events. Several variables are tested in the logistical regression including a) the historical level of burning in each state (high, medium or low levels of burning) based on an analysis by McCarty et al. (2011), b) year that state laws limit burning of fields, in addition to c) mean annual precipitation and mean annual temperature from a 4-kilometer gridded product from the PRISM Climate Group (2015). A K-fold model fitting procedure is used due to low frequency of burning and likelihood that outliers could influence the model fit. Specifically, the model is trained with a random selection of sample locations and evaluated with the remaining sample. This process is

repeated ten times to select a model that is most common among the set of ten, and avoid models that appear to be influenced by outliers due to the random draw of survey locations for training the model. In order to address uncertainty, a Monte Carlo analysis is used to sample the parameter estimates for the logistical regression model and produce one thousand estimates of burning for each crop in the remaining forty-two states included in this Inventory. State-level area burned data are divided by state-level crop area data to estimate the percent of crop area burned by crop type for each state. Table 5-32 shows the resulting percentage of crop residue burned at the national scale by crop type. State-level estimates are also available upon request.

Table 5-32: U.S. Average Percent Crop Area Burned by Crop (Percent)

Сгор	1990	2005	2011	2012	2013	2014
Maize	+	+	+	+	+	+
Rice	8%	8%	4%	5%	4%	6%
Wheat	1%	2%	2%	2%	2%	1%
Barley	1%	+	1%	1%	1%	1%
Oats	1%	1%	1%	1%	2%	1%
Other Small Grains	1%	1%	1%	1%	1%	1%
Sorghum	1%	1%	1%	1%	1%	1%
Cotton	1%	1%	1%	1%	1%	1%
Grass Hay	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+
Peas	+	+	1%	+	+	+
Sunflower	+	+	+	+	+	+
Tobacco	2%	2%	2%	2%	3%	3%
Vegetables	+	+	+	+	+	+
Chickpeas	+	1%	+	+	0%	0%
Dry Beans	1%	1%	1%	1%	+	+
Lentils	+	+	1%	+	+	+
Peanuts	3%	3%	3%	3%	3%	3%
Soybeans	+	+	+	1%	1%	1%
Potatoes	+	+	+	+	+	+
Sugarbeets	+	+	+	+	+	+

⁺ Does not exceed 0.5 percent

Additional parameters are needed to estimate the amount of burning, including residue: crop ratios, dry matter fractions, carbon fractions, nitrogen fractions and combustion efficiency. Residue: crop product mass ratios, residue dry matter fractions, and the residue N contents are obtained from several sources (IPCC 2006 and sources at bottom of Table 5-33). The residue C contents for all crops are based on IPCC (2006) default value for herbaceous biomass. The combustion efficiency is assumed to be 90 percent for all crop types (IPCC/UNEP/OECD/IEA 1997). See Table 5-33 for a summary of the crop-specific conversion factors. Emission ratios and mole ratio conversion factors for all gases are based on the Revised 1996 IPCC Guidelines (IPCC/UNEP/OECD/IEA 1997) (see Table 5-34).

Table 5-33: Parameters for Estimating Emissions from Field Burning of Agricultural Residues

Crop	Residue/Crop Ratio	Dry Matter Fraction	Carbon Fraction	Nitrogen Fraction	Combustion Efficiency (Fraction)
Maize	0.707	0.56	0.47	0.01	0.90
Rice	1.340	0.89	0.47	0.01	0.90
Wheat	1.725	0.89	0.47	0.01	0.90
Barley	1.181	0.89	0.47	0.01	0.90
Oats	1.374	0.89	0.47	0.01	0.90
Other Small Grains	1.777	0.88	0.47	0.01	0.90
Sorghum	0.780	0.60	0.47	0.01	0.90
Cotton	7.443	0.93	0.47	0.01	0.90
Grass Hay	0.208	0.90	0.47	0.02	0.90
Legume Hay	0.290	0.67	0.47	0.01	0.90
Peas	1.677	0.91	0.47	0.01	0.90
Sunflower	1.765	0.88	0.47	0.01	0.90
Tobacco	0.300	0.87	0.47	0.01	0.90
Vegetables	0.708	0.08	0.47	0.01	0.90
Chickpeas	1.588	0.91	0.47	0.01	0.90
Dry Beans	0.771	0.90	0.47	0.01	0.90
Lentils	1.837	0.91	0.47	0.02	0.90
Peanuts	1.600	0.94	0.47	0.02	0.90
Soybeans	1.500	0.91	0.47	0.01	0.90
Potatoes	0.379	0.25	0.47	0.02	0.90
Sugarbeets	0.196	0.22	0.47	0.02	0.90

Notes: Chickpeas: IPCC (2006), Table 11.2; values are for Beans & pulses.

Cotton: Combined sources (Heitholt et al. 1992; Halevy 1976; Wells and Meredith 1984; Sadras and Wilson 1997; Pettigrew and Meredith 1997; Torbert and Reeves 1994; Gerik et al. 1996; Brouder and Cassmen 1990; Fritschi et al. 2003; Pettigrew et al. 2005; Bouquet and Breitenbeck 2000; Mahroni and Aharonov 1964; Bange and Milroy 2004; Hollifield et al. 2000; Mondino et al. 2004; Wallach et al. 1978).

Lentils: IPCC (2006), Table 11.2; Beans & pulses.

Peas: IPCC (2006), Table 11.2; values are for Beans & pulses.

Peanuts: IPCC (2006); Table 11.2; Root ratio and belowground N content values are for Root crops, other.

Sugarbeets: IPCC (2006); Table 11.2; values are for Tubers.

Sunflower: IPCC (2006), Table 11.2; values are for Grains.

Sugarcane: combined sources (Wiedenfels 2000, Dua and Sharma 1976; Singels & Bezuidenhout 2002; Stirling et al. 1999; Sitompul et al. 2000).

Tobacco: combined sources (Beyaert 1996; Moustakas and Ntzanis 2005; Crafts-Brandner et al. 1994; Hopkinson 1967; Crafts-Brandner et al. 1987).

Vegetables (Combination of carrots, lettuce/cabbage, melons, onions, peppers and tomatoes):

Carrots: McPharlin et al. (1992); Gibberd et al. (2003); Reid and English (2000); Peach et al. (2000); see IPCC Tubers for R:S and N fraction.

Lettuce, cabbage: combined sources (Huett and Dettman 1991; De Pinheiro Henriques & Marcelis 2000; Huett and Dettman 1989; Peach et al. 2000; Kage et al. 2003; Tan et al. 1999; Kumar et al. 1994; MacLeod et al. 1971; Jacobs et al. 2004; Jacobs et al. 2001; Jacobs et al. 2002); values from IPCC Grains used for N fraction.

Melons: Valantin et al. (1999); squash for R:S; IPCC Grains for N fraction.

Onion: Peach et al. (2000), Halvorson et al. (2002); IPCC (2006) Tubers for N fraction.

Peppers: combined sources (Costa and Gianquinto 2002; Marcussi et al. 2004; Tadesse et al. 1999; Diaz-Perez et al. 2008); IPCC Grains for N fraction.

Tomatoes: Scholberg et al. (2000a,b); Akintoye et al. (2005); values for AGR-N and BGR-N are from Grains.

Table 5-34: Greenhouse Gas Emission Ratios and Conversion Factors

Gas	Emission Ratio	Conversion Factor
CH ₄ :C	0.005a	16/12
CO:C	0.060a	28/12
N ₂ O:N	0.007b	44/28
NO _x :N	0.121 ^b	30/14

^a Mass of C compound released (units of C) relative to mass of total C released from burning (units of C).

For this Inventory, new activity data on the burned areas have not been analyzed for 2015 to 2021. To complete the emissions time series, a linear extrapolation of the trend is applied to estimate the emissions in the last seven years of the inventory. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors is used to estimate the trend in emissions over time from 1990 through 2014, and the trend is used to approximate the CH₄, N_2O , CO and NO_x from 2015 to 2021 (Brockwell and Davis 2016). The Tier 2 method described previously will be applied to recalculate the emissions for the last seven years in the time series (2015 to 2021) in a future Inventory.

In order to ensure time-series consistency, the same method is applied from 1990 to 2014, and a linear extrapolation method is used to approximate emissions for the remainder of the time series based on the emissions data from 1990 to 2014. This extrapolation method is consistent with data splicing methods in IPCC (2006).

Uncertainty

Emissions are estimated using a linear regression model with autoregressive moving-average (ARMA) errors for 2021. The linear regression ARMA model produced estimates of the upper and lower bounds to quantify uncertainty (Table 5-35), and the results are summarized in Table 5-35. Methane emissions from field burning of agricultural residues in 2021 are between 0.4 and 0.6 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 16 percent below and 16 percent above the 2021 emission estimate of 0. MMT CO_2 Eq. Nitrous oxide emissions are between 0.1 and 0.2 MMT CO_2 Eq., or approximately 19 percent below and 19 percent above the 2021 emission estimate of 0.2 MMT CO_2 Eq.

Table 5-35: Approach 2 Quantitative Uncertainty Estimates for CH₄ and N₂O Emissions from Field Burning of Agricultural Residues (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertair	ainty Range Relative to Emission Estimate ^a					
		(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%	%)			
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Field Burning of Agricultural Residues	CH ₄	0.5	0.4	0.6	-16%	16%			
Field Burning of Agricultural Residues	N ₂ O	0.2	0.1	0.2	-19%	19%			

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Due to data limitations, there are additional uncertainties in agricultural residue burning, particularly the potential omission of burning associated with Kentucky bluegrass (produced on farms for turf grass installation) and sugarcane (see Annex 5 on sugarcane).

^b Mass of N compound released (units of N) relative to mass of total N released from burning (units of N).

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 524 of 1050 PageID 3972

QA/QC and Verification

A source-specific QA/QC plan for field burning of agricultural residues is implemented with Tier 1 analyses, consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. An error was identified in the calculation of the emissions using the IPCC (2006) equation, which was corrected in Box 5.6.

Recalculations Discussion

EPA updated the global warming potentials (GWPs) for calculating CO_2 -equivalent emissions of CH₄ (from 25 to 28) and N₂O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series to ensure consistency.

As a result of this change, CO_2 -equivalent CH_4 emissions increased by an annual average of 0.05 MMT CO_2 Eq., or 12 percent, over the time series from 1990 to 2020 compared to the previous Inventory. In contrast, N_2O emissions decreased by an annual average of 0.02 MMT CO_2 Eq., or 11 percent, over the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

A key planned improvement is to estimate the emissions associated with field burning of agricultural residues in the states of Alaska and Hawaii. In addition, a new method is in development that will directly link agricultural residue burning with the Tier 3 methods that are used in several other source categories, including Agricultural Soil Management, Cropland Remaining Cropland, and Land Converted to Cropland chapters of the Inventory. The method is based on simulating burning events directly within the DayCent process-based model framework using information derived from remote sensing fire products as described in the Methodology section. This improvement will lead to greater consistency in the methods for across sources, ensuring mass balance of C and N in the Inventory analysis.

As previously noted in this chapter, remote sensing data were used in combination with a resource survey to estimate non- CO_2 emissions and these data did not allow identification of burning of sugarcane (see Annex 5). EPA has received feedback on this category/crop type, which includes average estimates of emissions of sugarcane burning found in academic literature. EPA plans to incorporate the burning of sugarcane into the analysis during a future Inventory, as early as the 1990-2022 Inventory, when an updated analysis is conducted (see Annex 5).

6. Land Use, Land-Use Change, and **Forestry**

This chapter provides an assessment of the greenhouse gas fluxes resulting from land use and land-use change in the United States. ¹ The Intergovernmental Panel on Climate Change's 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2006) recommends reporting fluxes according to changes within and conversions between all land use types including: Forest Land, Cropland, Grassland, Wetlands, and Settlements (as well as Other Land).

The greenhouse gas flux from Forest Land Remaining Forest Land is reported for all forest ecosystem carbon (C) pools (i.e., aboveground biomass, belowground biomass, dead wood, litter, and mineral and organic soils), harvested wood pools, and non-carbon dioxide (non-CO₂) emissions from forest fires, the application of synthetic nitrogen fertilizers to forest soils, and the draining of organic soils. Fluxes from Land Converted to Forest Land are included for aboveground biomass, belowground biomass, dead wood, litter, and C stock changes from mineral soils, while C stock changes from drained organic soils and all non-CO₂ emissions from Land Converted to Forest Land are included in the fluxes from Forest Land Remaining Forest Land as it is not currently possible to separate these fluxes by conversion category.

Fluxes are reported for four agricultural land use/land-use change categories: Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, and Land Converted to Grassland. The reported greenhouse gas fluxes from these agricultural lands include changes in soil organic C stocks in mineral and organic soils due to land use and management, and for the subcategories of Forest Land Converted to Cropland and Forest Land Converted to Grassland, the changes in aboveground biomass, belowground biomass, dead wood, and litter C stocks are also reported. The greenhouse gas flux from Grassland Remaining Grassland also includes estimates of non-CO₂ emissions from grassland fires occurring on both Grassland Remaining Grassland and Land Converted to Grassland.

Fluxes from Wetlands Remaining Wetlands include changes in C stocks and methane (CH₄) and nitrous oxide (N₂O) emissions from managed peatlands, aboveground and belowground biomass, dead organic matter, soil C stock changes and CH₄ emissions from coastal wetlands, as well as N₂O emissions from aquaculture. In addition, CH₄ emissions from reservoirs and other constructed waterbodies are included for the subcategory Flooded Land Remaining Flooded Land. Estimates for Land Converted to Wetlands include aboveground and belowground biomass, dead organic matter and soil C stock changes, and CH₄ emissions from land converted to vegetated coastal wetlands. Carbon dioxide (CO₂) and CH₄ emissions are included for reservoirs and other constructed waterbodies under the subcategory Land Converted to Flooded Land.

 $^{^{1}}$ The term "flux" is used to describe the exchange of CO₂ to and from the atmosphere, with net flux of CO₂ being either positive or negative depending on the overall balance. Removal and long-term storage of CO2 from the atmosphere is also referred to as "carbon sequestration."

Fluxes from Settlements Remaining Settlements include changes in C stocks from organic soils, N₂O emissions from nitrogen fertilizer additions to soils, and CO₂ fluxes from settlement trees and landfilled yard trimmings and food scraps. The reported greenhouse gas flux from Land Converted to Settlements includes changes in C stocks in mineral and organic soils due to land use and management for all land use conversions to settlements, and the C stock changes in aboveground biomass, belowground biomass, dead wood, and litter are also included for the subcategory Forest Land Converted to Settlements.

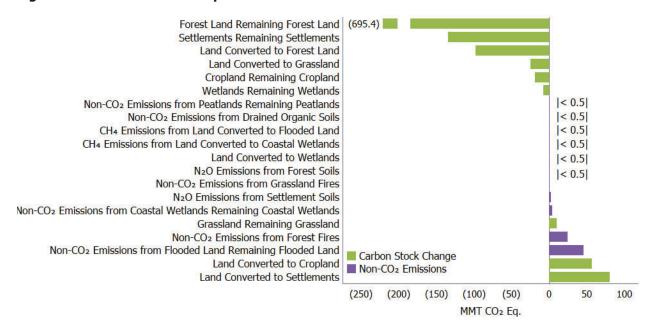
In 2021, the Land Use, Land-Use Change, and Forestry (LULUCF) sector resulted in a net increase in C stocks (i.e., net CO₂ removals) of 832.0 MMT CO₂ Eq. This represents an offset of approximately 13.1 percent of total (i.e., gross) greenhouse gas emissions in 2021. Emissions of CH₄ and N₂O from LULUCF activities in 2021 were 66.0 and 11.8 MMT CO₂ Eq., respectively, and combined represent 1.2 percent of total greenhouse gas emissions.³ In 2021, the overall net flux from LULUCF resulted in a removal of 754.2 MMT CO₂ Eq. Emissions, removals and net greenhouse gas flux from LULUCF are summarized in Figure 6-1 and Table 6-1 by land use and category, and Table 6-2 and Table 6-3 by gas in MMT CO₂ Eq. and kt, respectively. Trends in LULUCF sources and sinks over the 1990 to 2021 time series are shown in Figure 6-2.

Flooded Land Remaining Flooded Land was the largest source of non-CO₂ emissions from LULUCF in 2021, accounting for 58.4 percent of the LULUCF sector emissions. Non-CO₂ emissions from forest fires are the second largest source of LULUCF sector emissions; these emissions have increased 341.4 percent since 1990 and account for 31.4 percent of LULUCF emissions in 2021. Coastal Wetlands Remaining Coastal Wetlands and Settlements Remaining Settlements soils accounted for 5.7 and 2.6 percent of non-CO₂ emissions from LULUCF in 2021, respectively, and the remaining sources account for less than one percent each.

² LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

³ LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N₂O emissions from forest soils and settlement soils.

Figure 6-1: 2021 LULUCF Chapter Greenhouse Gas Sources and Sinks



Note: Parentheses in horizontal axis indicate net sequestration.

Figure 6-2: Trends in Emissions and Removals (Net CO₂ Flux) from Land Use, Land-Use Change, and Forestry

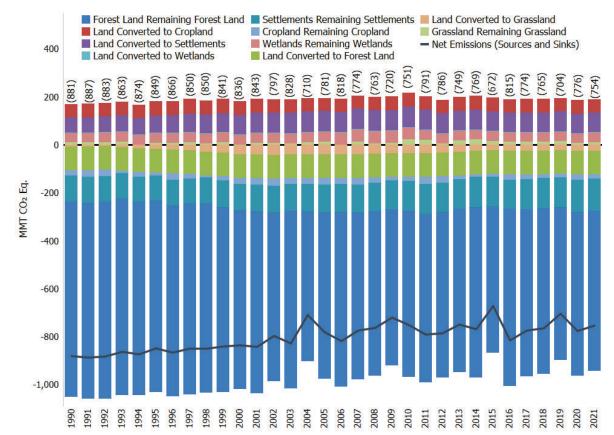


Table 6-1: Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO_2 Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Forest Land Remaining Forest Land	(815.8)	(695.4)	(695.2)	(692.9)	(638.1)	(684.0)	(670.5)
Changes in Forest Carbon Stocks ^a	(821.4)	(714.2)	(710.7)	(704.4)	(649.3)	(707.4)	(695.4)
Non-CO ₂ Emissions from Forest Fires ^b	5.5	18.3	15.0	11.0	10.8	23.0	24.4
N ₂ O Emissions from Forest Soils ^c	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Non-CO ₂ Emissions from Drained Organic							
Soils ^d	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Land Converted to Forest Land	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Changes in Forest Carbon Stockse	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Changes in Mineral and Organic Soil							
Carbon Stocks	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Changes in all Ecosystem Carbon Stocksf	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grassland	8.8	11.7	11.6	11.9	14.6	6.7	10.6
Changes in Mineral and Organic Soil							
Carbon Stocks	8.7	11.0	10.9	11.3	14.0	6.0	10.0
Non-CO ₂ Emissions from Grassland Fires ^g	0.2	0.7	0.6	0.6	0.6	0.6	0.6
Land Converted to Grassland	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Changes in all Ecosystem Carbon Stocks ^f	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlands	41.5	43.1	41.8	41.8	41.8	41.8	41.8
Changes in Organic Soil Carbon Stocks in							
Peatlands	1.1	1.1	0.8	0.8	0.8	0.7	0.7
Non-CO ₂ Emissions from Peatlands							
Remaining Peatlands	+	+	+	+	+	+	+
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Coastal Wetlands	(8.4)	(7.7)	(8.8)	(8.8)	(8.8)	(8.8)	(8.8)
CH ₄ Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	4.2	4.2	4.3	4.3	4.3	4.3	4.3
N ₂ O Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	0.1	0.2	0.1	0.1	0.1	0.1	0.1
CH ₄ Emissions from Flooded Land							
Remaining Flooded Land	44.6	45.3	45.4	45.4	45.4	45.4	45.4
Land Converted to Wetlands	3.3	1.4	0.8	0.8	0.8	0.6	0.6
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Land Converted to							
Coastal Wetlands	0.5	0.5	(+)	(+)	(+)	(+)	(+)
CH ₄ Emissions from Land Converted to			,	()	()	,	()
Coastal Wetlands	0.3	0.3	0.2	0.2	0.2	0.2	0.2
Changes in Land Converted to Flooded							
Land	1.4	0.4	0.4	0.4	0.4	0.3	0.3
CH ₄ Emissions from Land Converted to							
Flooded Land	1.1	0.3	0.3	0.3	0.3	0.2	0.2
Settlements Remaining Settlements	(107.8)	(113.9)	(125.6)	(125.0)	(124.5)	(131.6)	(132.5)
Changes in Organic Soil Carbon Stocks	11.3	12.2	16.0	15.9	15.9	15.9	15.9
Changes in Settlement Tree Carbon			20.0	20.5	20.0	20.0	20.0
Stocks	(96.4)	(117.4)	(129.6)	(129.5)	(129.3)	(136.7)	(137.8)
N ₂ O Emissions from Settlement Soils ^h	1.8	2.8	1.9	2.0	2.0	2.0	2.1
Changes in Yard Trimming and Food	1.0	2.0	1.5	2.0	2.0	2.0	2.1
Scrap Carbon Stocks in Landfills	(24.5)	(11.4)	(13.8)	(13.4)	(13.1)	(12.8)	(12.6)
Land Converted to Settlements	62.5	85.0	80.9	81.0	81.1	81.0	81.0
Changes in all Ecosystem Carbon Stocksf	62.5	85.0	80.9	81.0	81.1	81.0	81.0
LULUCF Emissionsi	57.9	72.4	68.3	64.4	64.2	76.4	77.8
CH ₄	53.5	61.3	60.1	57.3	56.9	65.4	66.0
CI 14	55.5	01.3	00.1	5/.3	50.9	05.4	0.00

N_2O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Change ^j	(938.9)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
LULUCF Sector Net Totalk	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)

- + Absolute value does not exceed 0.05 MMT CO₂ Eq.
- ^a Includes the net changes to carbon stocks stored in all forest ecosystem pools (estimates include C stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land) and harvested wood products.
- ^b Estimates include CH₄ and N₂O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^c Estimates include N₂O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- $^{
 m d}$ Estimates include CH $_{
 m 4}$ and N $_{
 m 2}$ O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land. Carbon stock changes from drained organic soils are included with the Forest Land Remaining Forest Land forest ecosystem pools.
- ^e Includes the net changes to carbon stocks stored in all forest ecosystem pools.
- f Includes changes in mineral and organic soil carbon stocks for all land-use conversions to cropland, grassland, and settlements. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements.
- g Estimates include CH $_4$ and N $_2$ O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.
- $^{\rm h}$ Estimates include N₂O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.
- ⁱ LULUCF emissions include the CH₄ and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N_2O emissions from forest soils and settlement soils.
- J LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land-use conversion categories.
- ^k The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

The C stock changes and emissions of CH₄ and N₂O from LULUCF are summarized in Table 6-2 (MMT CO₂ Eq.) and Table 6-3 (kt). Total net C sequestration in the LULUCF sector decreased by approximately 11.4 percent between 1990 and 2021. This decrease was primarily due to a decline in the rate of net C accumulation in Forest Land, as well as an increase in emissions from Land Converted to Settlements.⁴ Specifically, there was a net C accumulation in Settlements Remaining Settlements, which increased from 1990 to 2021, while the net C accumulation in Forest Land Remaining Forest Land and Land Converted to Wetlands slowed over this period. Net C accumulation remained steady from 1990 to 2021 in Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, and Wetlands Remaining Wetlands, while net C accumulation fluctuated in Grassland Remaining Grassland.

Flooded Land Remaining Flooded Land was the largest source of CH₄ emissions from LULUCF in 2021, totaling 45.4 MMT CO₂ Eq. (1,623 kt of CH₄). Forest fires resulted in CH₄ emissions of 15.5 MMT CO₂ Eq. (554 kt of CH₄). Coastal Wetlands Remaining Coastal Wetlands resulted in CH₄ emissions of 4.3 MMT CO₂ Eq. (154 kt of CH₄). Grassland fires resulted in CH₄ emissions of 0.3 MMT CO₂ Eq. (12 kt of CH₄). Land Converted to Flooded Land and Land Converted to Wetlands each resulted in CH₄ emissions of 0.2 MMT CO₂ Eq. (6 kt of CH₄). Drained organic soils on forest lands and Peatlands Remaining Peatlands resulted in CH₄ emissions of less than 0.05 MMT CO₂ Eq. each.

For N_2O emissions, forest fires were the largest source from LULUCF in 2021, totaling 8.9 MMT CO_2 Eq. (34 kt of N_2O). Nitrous oxide emissions from fertilizer application to settlement soils in 2021 totaled to 2.1 MMT CO_2 Eq. (8 kt of N_2O). This represents an increase of 14.9 percent since 1990. Additionally, the application of synthetic

-

⁴ Carbon sequestration estimates are net figures. The C stock in a given pool fluctuates due to both gains and losses. When losses exceed gains, the C stock decreases, and the pool acts as a source. When gains exceed losses, the C stock increases, and the pool acts as a sink; also referred to as net C sequestration or removal.

fertilizers to forest soils in 2021 resulted in N_2O emissions of 0.4 MMT CO_2 Eq. (2 kt of N_2O). Nitrous oxide emissions from fertilizer application to forest soils have increased by 455.1 percent since 1990, but still account for a relatively small portion of overall emissions. Grassland fires resulted in N_2O emissions of 0.3 MMT CO_2 Eq. (1 kt of N_2O). Coastal Wetlands Remaining Coastal Wetlands resulted in N_2O emissions of 0.1 MMT CO_2 Eq. (1 kt of N_2O). Drained organic soils on forest lands resulted in N_2O emissions of 0.1 MMT CO_2 Eq. (less than 0.05 kt of N_2O), and Peatlands Remaining Peatlands resulted in N_2O emissions of less than 0.05 MMT CO_2 Eq.

Table 6-2: Emissions and Removals from Land Use, Land-Use Change, and Forestry by Gas (MMT CO₂ Eq.)

Gas/Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Carbon Stock Change (CO ₂) ^a	(938.9)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
Forest Land Remaining Forest Land	(821.4)	(714.2)	(710.7)	(704.4)	(649.3)	(707.4)	(695.4)
Land Converted to Forest Land	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grassland	8.7	11.0	10.9	11.3	14.0	6.0	10.0
Land Converted to Grassland	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlands	(7.4)	(6.60)	(7.95)	(7.99)	(8.03)	(8.06)	(8.09)
Land Converted to Wetlands	1.9	0.8	0.3	0.3	0.3	0.3	0.3
Settlements Remaining Settlements	(109.6)	(116.6)	(127.5)	(127.0)	(126.5)	(133.6)	(134.5)
Land Converted to Settlements	62.5	85.0	80.9	81.0	81.1	81.0	81.0
CH ₄	53.5	61.3	60.1	57.3	56.9	65.4	66.0
Forest Land Remaining Forest Land:	3.2	10.9	9.6	6.9	6.4	15.0	15.5
Forest Fires ^b							
Forest Land Remaining Forest Land:							
Drained Organic Soilsd	+	+	+	+	+	+	+
Grassland Remaining Grassland:							
Grassland Fires ^c	0.1	0.4	0.3	0.3	0.3	0.3	0.3
Wetlands Remaining Wetlands: Flooded							
Land Remaining Flooded Land	44.6	45.3	45.4	45.4	45.4	45.4	45.4
Wetlands Remaining Wetlands: Coastal							
Wetlands Remaining Coastal Wetlands	4.2	4.2	4.3	4.3	4.3	4.3	4.3
Wetlands Remaining Wetlands:							
Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Land Converted to Wetlands: Land							
Converted to Flooded Lands	1.1	0.3	0.3	0.3	0.3	0.2	0.2
Land Converted to Wetlands: Land							
Converted to Coastal Wetlands	0.3	0.3	0.2	0.2	0.2	0.2	0.2
N ₂ O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
Forest Land Remaining Forest Land:							
Forest Fires ^b	2.3	7.4	5.4	4.2	4.4	8.0	8.9
Forest Land Remaining Forest Land:							
Forest Soils ^f	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Forest Land Remaining Forest Land:	0.12	• • • • • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • • • • • • • •	•	• • • • • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • • • • • • • •
Drained Organic Soils ^d	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Grassland Remaining Grassland:	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Grassland Fires ^c	0.1	0.3	0.3	0.3	0.3	0.3	0.3
Wetlands Remaining Wetlands: Coastal	0.1	0.5	0.5	0.5	0.5	0.5	0.5
Wetlands Remaining Coastal Wetlands	0.1	0.2	0.1	0.1	0.1	0.1	0.1
Wetlands Remaining Wetlands:	0.1	0.2	0.1	0.1	0.1	0.1	0.1
Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Settlements Remaining Settlements:		·	·	•	·	•	·
Settlement Soilse	1.8	2.8	1.9	2.0	2.0	2.0	2.1
LULUCF Carbon Stock Change ^a	(938.86)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
LULUCF Emissions ^g	57.9	72.4	68.3	64.4	64.2	76.4	77.8
LULUCF Sector Net Total ^h	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	
FOLOCE SECTOL MET LOCAL.	(001.0)	(101.1)	(//4.2)	(102.1)	(704.0)	(770.2)	(754.2)

- + Absolute value does not exceed 0.05 MMT CO₂ Eq.
- ^a LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.
- ^b Estimates include CH₄ and N₂O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^c Estimates include CH₄ and N₂O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- d Estimates include CH₄ and N₂O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland
- e Estimates include N₂O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- f Estimates include N₂O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements.
- g LULUCF emissions include the CH $_4$ and N $_2$ O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH $_4$ emissions from Flooded Land Remaining Flooded Land, Land Converted to Flooded Land, and Land Converted to Coastal Wetlands; and N $_2$ O emissions from forest soils and settlement soils.
- h The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-3: Emissions and Removals from Land Use, Land-Use Change, and Forestry by Gas (kt)

Gas/Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Carbon Stock Change (CO ₂) ^a	(938,856)	(853,529)	(842,516)	(829,501)	(768,224)	(852,534)	(832,039)
Forest Land Remaining Forest Land	(821,444)	(714,232)	(710,697)	(704,446)	(649,336)	(707,426)	(695,354)
Land Converted to Forest Land	(98,452)	(98,429)	(98,322)	(98,263)	(98,253)	(98,254)	(98,254)
Cropland Remaining Cropland	(23,176)	(29,001)	(22,293)	(16,597)	(14,544)	(23,335)	(18,940)
Land Converted to Cropland	54,792	54,651	56,597	56,327	56,280	56,725	56,511
Grassland Remaining Grassland	8,694	11,040	10,928	11,266	13,997	6,046	10,005
Land Converted to Grassland	(6,684)	(40,098)	(24,467)	(24,205)	(23,304)	(25,921)	(24,669)
Wetlands Remaining Wetlands	(7,372)	(6,601)	(7,953)	(7,990)	(8,031)	(8,059)	(8,095)
Land Converted to Wetlands	1884	820	339	341	349	250	256
Settlements Remaining Settlements	(109,567)	(116,642)	(127,510)	(126,961)	(126,469)	(133,610)	(134,514)
Land Converted to Settlements	62,469	84,965	80,860	81,026	81,087	81,050	81,014
CH ₄	1,911	2,190	2,145	2,048	2,032	2,336	2,356
Forest Land Remaining Forest Land:							
Forest Fires ^b	116	390	342	245	228	534	554
Forest Land Remaining Forest Land:							
Drained Organic Soilsd	1	1	1	1	1	1	1
Grassland Remaining Grassland:							
Grassland Fires ^c	3	13	12	12	12	12	12
Wetlands Remaining Wetlands:							
Flooded Land Remaining Flooded							
Land	1,592.8	1,617.0	1,620.7	1,620.8	1,620.9	1,622.7	1,622.8
Wetlands Remaining Wetlands:							
Coastal Wetlands Remaining Coastal							
Wetlands	149	151	153	153	153	154	154
Wetlands Remaining Wetlands:							
Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Land Converted to Wetlands: Land							
Converted to Flooded Lands	39	9	9	9	9	6	6
Land Converted to Wetlands: Land							
Converted to Coastal Wetlands	10	10	8	7	7	7	6

N ₂ O	17	42	31	27	27	41	45
Forest Land Remaining Forest Land:							
Forest Fires ^b	9	28	21	16	17	30	34
Forest Land Remaining Forest Land:							
Forest Soils ^f	+	2	2	2	2	2	2
Forest Land Remaining Forest Land:							
Drained Organic Soilsd	+	+	+	+	+	+	+
Grassland Remaining Grassland:							
Grassland Fires ^c	+	1	1	1	1	1	1
Wetlands Remaining Wetlands:							
Coastal Wetlands Remaining Coastal							
Wetlands	+	1	+	1	1	1	1
Wetlands Remaining Wetlands:							
Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Settlements Remaining Settlements:							
Settlement Soils ^e	7	10	7	7	8	8	8

- + Absolute value does not exceed 0.5 kt.
- ^a LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.
- ^b Estimates include CH₄ and N₂O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^c Estimates include CH₄ and N₂O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^d Estimates include CH₄ and N₂O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.
- e Estimates include N₂O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- f Estimates include N₂O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements.

Notes: Totals by gas may not sum due to independent rounding. Parentheses indicate net sequestration.

Each year, some emission and sink estimates in the LULUCF sector of the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emissions and sinks estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. Of the updates implemented for this Inventory, the most significant include (1) Flooded Land Remaining Flooded Land and Land Converted to Flooded Land: the National Wetland Inventory (NWI) is now used as the primary data source for flooded land surface area rather than the National Hydrography Data (NHD as the primary geospatial data source, (2) Forest Lands: use of new data from the National Forest Inventory (NFI) as well as updated fire data and harvested wood products' (HWP) data, and using plot-level soil orders based on the more refined gridded National Soil Survey Geographic Database (gNATSGO) dataset rather than the Digital General Soil Map of the United States (STATSGO2) dataset which had been used in previous Inventories; and (3) Coastal Wetlands: an update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forest Land Remaining Forest Land and to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since, states classified as wet temperate, cold temperate and Mediterranean climate zones fall under the category of Land Converted to Forest Land. Together, these updates decreased total C sequestration by 40.4 MMT CO₂ Eq. (5.0 percent) and increased total non-CO₂ emissions by 23.4 MMT CO₂ Eq. (44.1 percent), compared to the previous Inventory (i.e., 1990 to 2020). In addition, for the current Inventory, CO₂equivalent emissions totals of CH₄ and N₂O have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). Including the impacts of the GWP update, non-CO₂ emissions from LULUCF increased by an average of 33.8 MMT CO₂ (76 percent) across the timeseries. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

For more information on specific methodological updates, please see the Recalculations discussion within the respective source category section of this chapter.

Emissions and removals reported in the LULUCF chapter include those from all states; however, for Hawaii and Alaska some emissions and removals from land use and land-use change are not included (see chapter sections on Uncertainty and Planned Improvements for more details). In addition, U.S. Territories are not included for most categories. EPA continues to review available data on an ongoing basis to include emissions and removals from U.S. Territories in future inventories to the extent they are occurring (e.g., see Box 6-2). See Annex 5 for more information on EPA's assessment of the emissions and removals not included in this Inventory.

Box 6-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the gross emissions total presented in this report for the United States excludes emissions and removals from LULUCF. The LULUCF Sector Net Total presented in this report for the United States includes emissions and removals from LULUCF. All emissions and removals estimates are calculated using internationally accepted methods provided by the IPCC in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines), 2013 Supplement to the 2006 IPCC Guidelines for National GHG Inventories: Wetlands, and the 2019 Refinement to the 2006 IPCC Guidelines for National GHG Inventories. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common manner in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and removals provided in the Land Use Land-Use Change and Forestry chapter does not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follow this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals.

6.1 Representation of the U.S. Land Base

A national land use representation system that is consistent and complete, both temporally and spatially, is needed in order to assess land use and land-use change status and the associated greenhouse gas fluxes over the Inventory time series. This system should be consistent with IPCC (2006), such that all countries reporting on national greenhouse gas fluxes to the UNFCCC should: (1) describe the methods and definitions used to determine areas of managed and unmanaged lands in the country (Table 6-4), (2) describe and apply a consistent set of definitions for land-use categories over the entire national land base and time series (i.e., such that increases in the land areas within particular land-use categories are balanced by decreases in the land areas of other categories unless the national land base is changing) (Table 6-5), and (3) account for greenhouse gas fluxes on all managed lands. The IPCC (2006, Vol. IV, Chapter 1) considers all anthropogenic greenhouse gas emissions and removals associated with land use and management to occur on managed land, and all emissions and removals on managed land should be reported based on this guidance (See IPCC (2010), Ogle et al. (2018) for further discussion). Consequently, managed land serves as a proxy for anthropogenic emissions and removals. This proxy is intended to provide a practical framework for conducting an inventory, even though some of the greenhouse gas emissions and removals on managed land are influenced by natural processes that may or may not be interacting with the

⁵ See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

-

anthropogenic drivers. This section of the Inventory has been developed in order to comply with this guidance. While the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories provide guidance for factoring out natural emissions and removals, the United States does not apply this guidance and estimates all emissions/removals on managed land regardless of whether the driver was natural.

Three databases are used to track land management in the United States and are used as the basis to classify United States land area into the thirty-six IPCC land use and land-use change categories (Table 6-5) (IPCC 2006). The three primary databases are the U.S. Department of Agriculture (USDA) National Resources Inventory (NRI), 6 the USDA Forest Service (USFS) Forest Inventory and Analysis (FIA) Database, and the Multi-Resolution Land Characteristics Consortium (MRLC) National Land Cover Dataset (NLCD). 8

The total land area included in the United States Inventory is 936 million hectares across the 50 states. Approximately 886 million hectares of this land base is considered *managed* and 50 million hectares is *unmanaged*, a distribution that has remained stable over the time series of the Inventory (Table 6-5). In 2021, the United States had a total of 280 million hectares of managed forest land (0.71 percent decrease compared to 1990). There are 160 million hectares of cropland (8.3 percent decrease compared to 1990), 339 million hectares of managed Grassland (0.4 percent increase compared to 1990), 39 million hectares of managed Wetlands (4.6 percent increase compared to 1990), 47 million hectares of Settlements (41 percent increase compared to 1990), and 21 million hectares of managed Other Land (1.0 percent decrease compared to 1990) (Table 6-5).

Wetlands are not differentiated between managed and unmanaged with the exception of remote areas in Alaska, and so are reported mostly as managed. ¹⁰ In addition, C stock changes are not currently estimated for the entire managed land base, which leads to discrepancies between the managed land area data presented here and in the subsequent sections of the Inventory (e.g., Grassland Remaining Grassland within interior Alaska). ^{11,12} Planned improvements are under development to estimate C stock changes and greenhouse gas emissions on all managed land and to ensure consistency between the total area of managed land in the land-representation description and the remainder of the Inventory.

Dominant land uses vary by region, largely due to climate patterns, soil types, geology, proximity to coastal regions, and historical settlement patterns (Figure 6-3). Forest land tends to be more common in the eastern United States, mountainous regions of the western United States, and Alaska. Cropland is concentrated in the mid-continent region of the United States, and Grassland is more common in the western United States and Alaska. Wetlands are fairly ubiquitous throughout the United States, though they are more common in the upper Midwest

⁶ NRI data are available at https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/nra/nri/.

⁷ FIA data are available at https://www.fia.fs.usda.gov/tools-data/index.php.

⁸ NLCD data are available at http://www.mrlc.gov/ and MRLC is a consortium of several U.S. government agencies.

⁹ The current land representation does not include areas from U.S. Territories, but there are planned improvements to include these regions in future Inventories. U.S. Territories represent approximately 0.1 percent of the total land base for the United States. See Box 6-2.

¹⁰ According to the IPCC (2006), wetlands are considered managed if they are created through human activity, such as dam construction, or the water level is artificially altered by human activity. Distinguishing between managed and unmanaged wetlands in the conterminous United States and Alaska is difficult due to limited data availability. Wetlands are not characterized within the NRI with information regarding water table management. As a result, all Wetlands in the conterminous United States and Hawaii are reported as managed in the Land Representation, but emission/removal estimates only developed for those wetlands that are included under the Flooded Lands, Coastal Wetlands or Peat Extraction categories. See the Planned Improvements section of the Inventory for future refinements to the Wetland area estimates.

¹¹ Other discrepancies occur because the coastal wetlands analysis is based on another land use product (NOAA C-CAP) that is not currently incorporated into the land representation analysis for this section, which relies on the NRI and NLCD for wetland areas. EPA anticipates addressing these discrepancies in future Inventories.

 $^{^{12}}$ These "managed area" discrepancies also occur in the Common Reporting Format (CRF) tables submitted to the UNFCCC.

and eastern portions of the country, as well as coastal regions. Settlements are more concentrated along the coastal margins and in the eastern states.

Table 6-4: Managed and Unmanaged Land Area by Land-Use Categories for All 50 States (Thousands of Hectares)

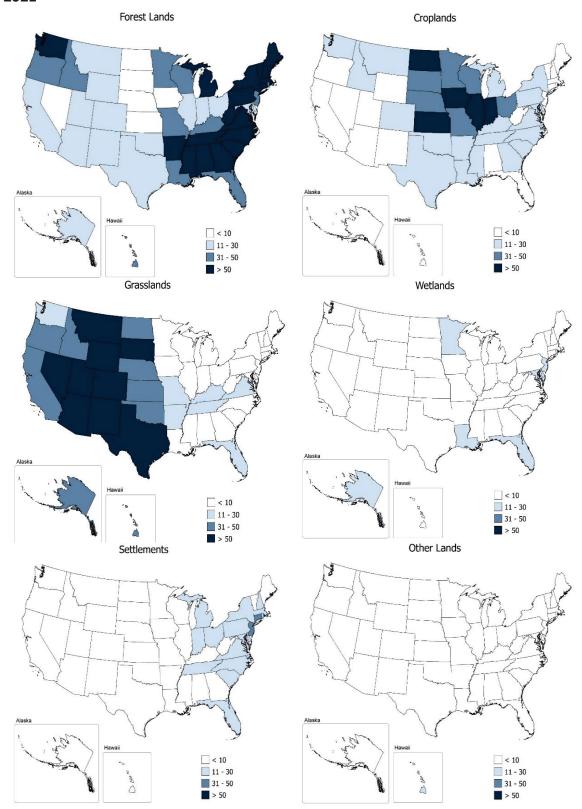
Land Use Categories	1990	2005	2017	2018	2019	2020	2021
Managed Lands	886,533	886,530	886,531	886,531	886,531	886,531	886,531
Forest	282,357	281,755	281,057	280,870	280,686	280,519	280,363
Croplands	174,496	165,622	161,922	161,394	160,693	160,111	160,077
Grasslands	337,639	339,694	338,053	338,264	338,722	339,138	338,989
Settlements	33,427	40,210	45,595	45,972	46,306	46,654	46,970
Wetlands	37,704	38,661	39,108	39,251	39,380	39,382	39,438
Other	20,910	20,588	20,796	20,779	20,743	20,727	20,693
Unmanaged Lands	49,708	49,711	49,710	49,710	49,710	49,710	49,710
Forest	10,260	10,260	10,264	10,264	10,264	10,264	10,269
Croplands	0	0	0	0	0	0	0
Grasslands	24,666	24,686	24,696	24,696	24,696	24,696	24,691
Settlements	0	0	0	0	0	0	0
Wetlands	4,048	4,047	4,058	4,058	4,058	4,058	4,058
Other	10,734	10,718	10,692	10,692	10,692	10,692	10,692
Total Land Areas	936,241	936,241	936,241	936,241	936,241	936,241	936,241
Forest	292,617	292,016	291,321	291,134	290,951	290,782	290,632
Croplands	174,496	165,622	161,922	161,394	160,693	160,111	160,077
Grasslands	362,305	364,380	362,749	362,960	363,417	363,834	363,680
Settlements	33,427	40,210	45,595	45,972	46,307	46,654	46,971
Wetlands	41,752	42,708	43,167	43,310	43,439	43,441	43,496
Other	31,644	31,306	31,488	31,471	31,435	31,419	31,385

Table 6-5: Land Use and Land-Use Change for the U.S. Managed Land Base for All 50 States (Thousands of Hectares)

Land Use & Land-Use							
Change Categories ^a	1990	2005	2017	2018	2019	2020	2021
Total Forest Land	282,357	281,755	281,057	280,870	280,686	280,519	280,363
FF	281,232	280,457	279,841	279,778	279,616	279,446	279,298
CF	216	154	110	101	87	83	82
GF	805	1,028	959	855	862	867	869
WF	13	23	19	19	16	15	14
SF	11	18	19	19	19	19	19
OF	79	77	108	99	86	89	81
Total Cropland	174,496	165,622	161,922	161,394	160,693	160,111	160,077
CC	162,265	150,400	148,327	149,721	149,504	149,817	150,586
FC	178	83	64	63	63	63	66
GC	11,673	14,623	13,121	11,231	10,758	9,914	9,132
WC	119	178	102	99	98	86	81
SC	75	102	122	107	105	101	97
OC	186	235	186	173	166	129	115
Total Grassland	337,639	339,694	338,053	338,264	338,722	339,138	338,989
GG	328,320	316,625	318,704	321,748	322,632	323,883	325,096
FG	591	642	722	733	746	726	704
CG	8,177	17,746	16,075	13,594	13,491	13,205	12,200
WG	168	466	199	181	172	159	143
SG	43	525	283	230	190	139	100
OG	341	3,692	2,070	1,778	1,491	1,026	746

Total Wetlands	37,704	38,661	39,108	39,251	39,380	39,382	39,438
WW	37,148	36,636	37,727	38,020	38,283	38,426	38,613
FW	38	73	71	69	57	57	51
CW	145	637	403	362	310	261	221
GW	326	1,169	662	564	501	415	342
SW	0	38	21	17	14	10	2
OW	47	107	225	220	216	212	210
Total Settlements	33,427	40,210	45,595	45,972	46,306	46,654	46,970
SS	30,561	31,445	39,875	40,771	41,617	42,467	43,189
FS	301	503	483	467	449	460	456
CS	1,231	3,604	2,110	1,917	1,726	1,528	1,366
GS	1,276	4,371	2,919	2,630	2,349	2,062	1,830
WS	4	59	39	30	25	18	14
OS	54	229	169	157	141	120	115
Total Other Land	20,910	20,588	20,796	20,779	20,743	20,727	20,693
00	20,175	17,019	17,874	18,059	18,305	18,563	18,817
FO	53	81	97	96	98	100	106
CO	287	603	670	629	582	540	489
GO	371	2,764	1,929	1,772	1,541	1,309	1,068
WO	22	100	208	206	206	205	204
SO	2	21	18	17	11	10	10
Grand Total	886,533	886,530	886,531	886,531	886,531	886,531	886,531

Figure 6-3: Percent of Total Land Area for Each State in the General Land Use Categories for 2021



Methodology and Time-Series Consistency

IPCC (2006) describes three approaches for representing land areas. Approach 1 provides data on the total area for each individual land use category, but does not provide detailed information on transfer of land area between categories following land-use change and is not spatially explicit other than at the national or regional level. With Approach 1, total net conversions between categories can be detected, but not the individual changes (i.e., additions and/or losses) between the land-use categories that led to those net changes. Approach 2 introduces tracking of individual land-use changes between the categories (e.g., Forest Land to Cropland, Cropland to Forest Land, and Grassland to Cropland), using survey samples or other forms of data, but does not provide spatially-explicit location data. Approach 3 extends Approach 2 by providing spatially-explicit location data, such as surveys with spatially identified sample locations and maps obtained from remote sensing products. The three approaches are not presented as hierarchical tiers and are not mutually exclusive.

According to IPCC (2006), the approach or mix of approaches selected by an inventory agency should reflect calculation needs and national circumstances. For this analysis, the NRI, FIA, and the NLCD have been combined to provide a complete representation of land use for managed lands. These data sources are described in more detail later in this section. NRI, FIA and NLCD are Approach 3 data sources that provide spatially-explicit representations of land use and land-use conversions. Lands are treated as remaining in the same category (e.g., Cropland Remaining Cropland) if a land-use change has not occurred in the last 20 years. Otherwise, the land is classified in a land-use change category based on the current use and most recent use before conversion to the current use (e.g., Cropland Converted to Forest Land).

Definitions of Land Use in the United States

Managed and Unmanaged Land

The United States definition of managed land is similar to the general definition of managed land provided by the IPCC (2006), but with some additional elaboration to reflect national circumstances. Based on the following definitions, most lands in the United States are classified as managed:

- Managed Land: Land is considered managed if direct human intervention has influenced its condition.
 Direct intervention occurs mostly in areas accessible to human activity and includes altering or
 maintaining the condition of the land to produce commercial or non-commercial products or services; to
 serve as transportation corridors or locations for buildings, landfills, or other developed areas for
 commercial or non-commercial purposes; to extract resources or facilitate acquisition of resources; or to
 provide social functions for personal, community, or societal objectives where these areas are readily
 accessible to society.¹³
- Unmanaged Land: All other land is considered unmanaged. Unmanaged land is largely comprised of areas inaccessible to society due to the remoteness of the locations. Though these lands may be influenced

6-14 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

¹³ Wetlands are an exception to this general definition, because these lands, as specified by IPCC (2006), are only considered managed if they are created through human activity, such as dam construction, or the water level is artificially altered by human activity. Distinguishing between managed and unmanaged wetlands in the United States is difficult due to limited data availability. Wetlands are not characterized within the NRI with information regarding water table management or origin (i.e., constructed rather than natural origin). Therefore, unless wetlands are converted into cropland or grassland, it is not possible to know if they are artificially created or if the water table is managed based on the use of NRI data. As a result, most wetlands are reported as managed with the exception of wetlands in remote areas of Alaska, but emissions from managed wetlands are only reported for coastal regions, flooded lands (e.g., reservoirs) and peatlands where peat extraction occurs due to insufficient activity data to estimate emissions and limited resources to improve the Inventory. See the Planned Improvements section of the Inventory for future refinements to the wetland area estimates.

indirectly by human actions such as atmospheric deposition of chemical species produced in industry or CO₂ fertilization, they are not influenced by a direct human intervention.¹⁴

In addition, land that is previously managed remains in the managed land base for 20 years before re-classifying the land as unmanaged in order to account for legacy effects of management on C stocks. ¹⁵ Unmanaged land is also re-classified as managed over time if anthropogenic activity is introduced into the area based on the definition of managed land.

Land-Use Categories

As with the definition of managed lands, IPCC (2006) provides general non-prescriptive definitions for the six main land-use categories: Forest Land, Cropland, Grassland, Wetlands, Settlements and Other Land. In order to reflect national circumstances, country-specific definitions have been developed, based predominantly on criteria used in the land use surveys for the United States. Specifically, the definition of Forest Land is based on the FIA definition of forest, ¹⁶ while definitions of Cropland, Grassland, and Settlements are based on the NRI. ¹⁷ The definitions for Other Land and Wetlands are based on the IPCC (2006) definitions for these categories.

- Forest Land: A land-use category that includes areas at least 120 feet (36.6 meters) wide and at least one acre (0.4 hectare) in size with at least 10 percent cover (or equivalent stocking) by live trees including land that formerly had such tree cover and that will be naturally or artificially regenerated. Trees are woody plants having a more or less erect perennial stem(s) capable of achieving at least 3 inches (7.6 cm) in diameter at breast height, or 5 inches (12.7 cm) diameter at root collar, and a height of 16.4 feet (5 m) at maturity in situ. Forest Land includes all areas recently having such conditions and currently regenerating or capable of attaining such condition in the near future. Forest Land also includes transition zones, such as areas between forest and non-forest lands that have at least 10 percent cover (or equivalent stocking) with live trees and forest areas adjacent to urban and built-up lands. Unimproved roads and trails, streams, and clearings in forest areas are classified as forest if they are less than 120 feet (36.6 m) wide or an acre (0.4 ha) in size. However, land is not classified as Forest Land if completely surrounded by urban or developed lands, even if the criteria are consistent with the tree area and cover requirements for Forest Land. These areas are classified as Settlements. In addition, Forest Land does not include land that is predominantly under an agricultural land use (Nelson et al. 2020).
- Cropland: A land-use category that includes areas used for the production of adapted crops for harvest;
 this category includes both cultivated and non-cultivated lands. Cultivated crops include row crops or
 close-grown crops and also pasture in rotation with cultivated crops. Non-cultivated cropland includes
 continuous hay, perennial crops (e.g., orchards) and horticultural cropland. Cropland also includes land
 with agroforestry, such as alley cropping and windbreaks, 18 if the dominant use is crop production,
 assuming the stand or woodlot does not meet the criteria for Forest Land. Lands in temporary fallow or

¹⁴ There are some areas, such as Forest Land and Grassland in Alaska that are classified as unmanaged land due to the remoteness of their location.

¹⁵ There are examples of managed land transitioning to unmanaged land in the U.S. For example, in 2018, 100 hectares of managed grassland converted to unmanaged because data indicated that no further grazing occurred. Livestock data are collected annually by the Department of Agriculture, and no livestock had occurred in the area since the mid-1970s, and therefore there was no longer active management through livestock grazing. The area is also remote, at least 10 miles from roads and settlements, and therefore the land was no longer managed based on the implementation criteria.

¹⁶ See https://www.fia.fs.usda.gov/library/field-guides-methods-proc/docs/2022/core_ver9-2_9_2022_SW_HW%20table.pdf, page 23.

¹⁷ See https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/nra/nri/.

¹⁸ Currently, there is no data source to account for biomass C stock change associated with woody plant growth and losses in alley cropping systems and windbreaks in cropping systems, although these areas are included in the Cropland land base.

- enrolled in conservation reserve programs (i.e., set-asides¹⁹) are also classified as Cropland, as long as these areas do not meet the Forest Land criteria. Roads through Cropland, including interstate highways, state highways, other paved roads, gravel roads, dirt roads, and railroads are excluded from Cropland area estimates and are, instead, classified as Settlements.
- Grassland: A land-use category on which the plant cover is composed principally of grasses, grass-like plants (i.e., sedges and rushes), forbs, or shrubs suitable for grazing and browsing, and includes both pastures and native rangelands. This includes areas where practices such as clearing, burning, chaining, and/or chemicals are applied to maintain the grass vegetation. Land is also categorized as Grassland if there have been three or fewer years of continuous hay production. 20 Savannas, deserts, and tundra are considered Grassland.²¹ Drained wetlands are considered Grassland if the dominant vegetation meets the plant cover criteria for Grassland. Woody plant communities of low forbs, shrubs and woodlands, such as sagebrush, mesquite, chaparral, mountain shrubland, and pinyon-juniper, are also classified as Grassland if they do not meet the criteria for Forest Land. Grassland includes land managed with agroforestry practices, such as silvopasture and windbreaks, if the land is principally grass, grass-like plants, forbs, and shrubs suitable for grazing and browsing, and assuming the stand or woodlot does not meet the criteria for Forest Land. Roads through Grassland, including interstate highways, state highways, other paved roads, gravel roads, dirt roads, and railroads are excluded from Grassland and are, instead, classified as Settlements.
- Wetlands: A land-use category that includes land covered or saturated by water for all or part of the year, in addition to lakes, reservoirs, and rivers. In addition, all coastal wetlands are considered managed regardless of whether the water level is changed or if they were created by human activity. Certain areas that fall under the managed Wetlands definition are included in other land uses based on the IPCC guidance and national circumstances, including lands that are flooded for most or just part of the year in Croplands (e.g., rice cultivation and cranberry production), Grasslands (e.g., wet meadows dominated by grass cover) and Forest Lands (e.g., Riparian Forests near waterways). See Section 6.8 Wetlands Remaining Wetlands for more information.
- Settlements: A land-use category representing developed areas consisting of units equal to or greater than 0.25 acres (0.1 ha) that includes residential, industrial, commercial, and institutional land; construction sites; public administrative sites; railroad yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment plants; water control structures and spillways; parks within urban and built-up areas; and highways, railroads, and other transportation facilities. Also included are all tracts that may meet the definition of Forest Land, and tracts of less than 10 acres (4.05 ha) that may meet the definitions for Cropland, Grassland, or Other Land but are completely surrounded by urban or built-up land, and so are included in the Settlements category. Rural transportation corridors located within other land uses (e.g., Forest Land, Cropland, and Grassland) are also included in Settlements.
- Other Land: A land-use category that includes bare soil, rock, ice, and all land areas that do not fall into any of the other five land-use categories. Following the guidance provided by the IPCC (2006), C stock changes and non-CO2 emissions are not estimated for Other Lands because these areas are largely devoid of biomass, litter and soil C pools. However, C stock changes and non-CO₂ emissions should be estimated

¹⁹ A set-aside is cropland that has been taken out of active cropping and converted to some type of vegetative cover, including, for example, native grasses or trees, but is still classified as cropland based on national circumstances.

²⁰ Areas with four or more years of continuous hay production are Cropland because the land is typically more intensively managed with cultivation, greater amounts of inputs, and other practices. Occasional harvest of hay from grasslands typically does not involve cultivation or other intensive management practices.

²¹ 2006 IPCC Guidelines do not include provisions to separate desert and tundra as land-use categories.

for Land Converted to Other Land during the first 20 years following conversion to account for legacy effects.

Land Use Data Sources: Description and Application to U.S. Land Area Classification

U.S. Land Use Data Sources

The three main sources for land use data in the United States are the NRI, FIA, and the NLCD (Table 6-6). These data sources are combined to account for land use in all 50 states. FIA and NRI data are used when available for an area because these surveys contain additional information on management, site conditions, crop types, biometric measurements, and other data that are needed to estimate C stock changes, N₂O, and CH₄ emissions on those lands. If NRI and FIA data are not available for an area, however, then the NLCD product is used to represent the land use

Table 6-6: Data Sources Used to Determine Land Use and Land Area for the Conterminous United States, Hawaii, and Alaska

	NRI	FIA	NLCD
Forest Land			
Conterminous			
United States			
Non-Fea	leral	•	
Fea	leral	•	
Hawaii			
Non-Fea	leral •		
Fea	leral		•
Alaska			
Non-Fea	leral	•	
Fea	leral	•	
Croplands, Grasslands,	Other Lands, Settle	ments, and Wetl	ands
Conterminous			
United States			
Non-Fea	leral •		
Fea	leral		•
Hawaii			
Non-Fea	leral •		
Fea	leral		•
Alaska			
Non-Fea	leral		•
Fed	deral		•

National Resources Inventory

For the Inventory, the NRI is the official source of data for land use and land-use change on non-federal lands in the conterminous United States and Hawaii, and is also used to determine the total land base for the conterminous United States and Hawaii. The NRI is a statistically-based survey conducted by the USDA Natural Resources Conservation Service and is designed to assess soil, water, and related environmental resources on non-federal lands. The NRI has a stratified multi-stage sampling design, where primary sample units are stratified on the basis of county and township boundaries defined by the United States Public Land Survey (Nusser and Goebel 1997). Within a primary sample unit (typically a 160 acre [64.75 ha] square quarter-section), three sample points are selected according to a restricted randomization procedure. Each point in the survey is assigned an area weight (expansion factor) based on other known areas and land use information (Nusser and Goebel 1997). The NRI survey utilizes data obtained from remote sensing imagery and site visits in order to provide detailed information on land use and management, particularly for Croplands and Grasslands (i.e., agricultural lands), and is used as the

basis to account for C stock changes in agricultural lands (except federal grasslands). The NRI survey was conducted every 5 years between 1982 and 1997, but shifted to annualized data collection in 1998. The land use between five-year periods from 1982 and 1997 are assumed to be the same for a five-year time period if the land use is the same at the beginning and end of the five-year period (Note: most of the data has the same land use at the beginning and end of the five-year periods). If the land use had changed during a five-year period, then the change is assigned at random to one of the five years. For crop histories, years with missing data are estimated based on the sequence of crops grown during years preceding and succeeding a missing year in the NRI history. This gap-filling approach allows for development of a full time series of land use data for non-federal lands in the conterminous United States and Hawaii. This Inventory incorporates data through 2017 from the NRI. The land use patterns are assumed to remain the same from 2018 through 2021 for this Inventory, but the time series will be updated when new data are integrated into the land representation analysis.

Forest Inventory and Analysis

The FIA program, conducted by the USFS, is the official source of data on forest land area and management data for the Inventory and is another statistically-based survey for the United States. FIA engages in a hierarchical system of sampling, with sampling categorized as Phases 1 through 3, in which sample points for phases are subsets of the previous phase. Phase 1 refers to collection of remotely-sensed data (either aerial photographs or satellite imagery) primarily to classify land into forest or non-forest and to identify landscape patterns like fragmentation and urbanization. Phase 2 is the collection of field data on a network of ground plots that enable classification and summarization of area, tree, and other attributes associated with forest land uses. Phase 3 plots are a subset of Phase 2 plots where data on indicators of forest health are measured. Data from all three phases are also used to estimate C stock changes for forest land. Historically, FIA inventory surveys have been conducted periodically, with all plots in a state being measured at a frequency of every five to 10 years. A new national plot design and annual sampling design was introduced by the FIA program in 1998 and is now used in all states. Annualized sampling means that a portion of plots throughout each state is sampled each year, with the goal of measuring all plots once every five to seven years in the eastern United States and once every ten years in the western United States. See Annex 3.13 to see the specific survey data available by state. The most recent year of available data varies state by state (range of most recent data is from 2018 through 2021; see Table A-183 in Annex 3.13).

National Land Cover Dataset

As noted above, while the NRI survey sample covers the conterminous United States and Hawaii, land use data are only collected on non-federal lands. Gaps exist in the land representation when the NRI and FIA datasets are combined, such as federal grasslands operated by Bureau of Land Management (BLM), USDA, and National Park Service, as well as Alaska.²² The NLCD is used to account for land use on federal lands in the conterminous United States and Hawaii, in addition to federal and non-federal lands in Alaska with the exception of forest lands in Alaska.

NLCD products provide land-cover for 1992, 2001, 2004, 2006, 2008, 2011, 2013, 2016, and 2019 in the conterminous United States (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015), and also for Alaska in 2001, 2011, and 2016 and Hawaii in 2001. A NLCD change product is not available for Hawaii because data are only available for one year, i.e., 2001. The NLCD products are based primarily on Landsat Thematic Mapper imagery at a 30-meter resolution, and the land cover categories have been aggregated into the 36 IPCC land-use categories for the conterminous United States and Alaska, and into the six IPCC land-use categories for Hawaii. The land use patterns are assumed to remain the same after the last year of data in the time series, which is 2001 for Hawaii,

²² The NRI survey program does not include U.S. Territories with the exception of non-federal lands in Puerto Rico. The FIA program recently began implementing surveys of forest land in U.S. Territories and those data will be used in the years ahead. Furthermore, NLCD does not include coverage for all U.S. Territories.

2019 for the conterminous United States and 2016 for Alaska, but the time series will be updated when new data are released.

For the conterminous United States, the aggregated maps of IPCC land-use categories obtained from the NLCD products were used in combination with the NRI database to represent land use and land-use change for federal lands, with the exception of forest lands, which are based on FIA. Specifically, NRI survey locations designated as federal lands were assigned a land use/land-use change category based on the NLCD maps that had been aggregated into the IPCC categories. This analysis addressed shifts in land ownership across years between federal or non-federal classes as represented in the NRI survey (i.e., the ownership is classified for each survey location in the NRI). The sources of these additional data are discussed in subsequent sections of the report.

Managed Land Designation

Lands are designated as managed in the United States based on the definition provided earlier in this section. The following criteria are used in order to apply the definition in an analysis of managed land:

- All croplands and settlements are designated as managed so only grassland, forest land, wetlands or other lands may be designated as unmanaged land;²³
- All forest lands with active fire protection are considered managed;
- All forest lands designated for timber harvests are considered managed;
- All grasslands are considered managed at a county scale if there are grazing livestock in the county;
- Other areas are considered managed if accessible based on the proximity to roads and other transportation corridors, and/or infrastructure;
- Protected lands maintained for recreational and conservation purposes are considered managed (i.e., managed by public and/or private organizations);
- Lands with active and/or past resource extraction are considered managed; and
- Lands that were previously managed but subsequently classified as unmanaged, remain in the managed land base for 20 years following the conversion to account for legacy effects of management on C stocks.

The analysis of managed lands, based on the criteria listed above, is conducted using a geographic information system (Ogle et al. 2018). Lands that are used for crop production or settlements are determined from the NLCD (Fry et al. 2011; Homer et al. 2007; Homer et al. 2015). Forest lands with active fire management are determined from maps of federal and state management plans from the National Atlas (U.S. Department of Interior 2005) and Alaska Interagency Fire Management Council (1998). It is noteworthy that all forest lands in the conterminous United States have active fire protection, and are therefore designated as managed regardless of accessibility or other criteria. In addition, forest lands with timber harvests are designated as managed based on county-level estimates of timber products in the U.S. Forest Service Timber Products Output Reports (U.S. Department of Agriculture 2012). Timber harvest data lead to additional designation of managed forest land in Alaska. The designation of grasslands as managed is based on grazing livestock population data at the county scale from the USDA National Agricultural Statistics Service (U.S. Department of Agriculture 2015). Accessibility is evaluated based on a 10-km buffer surrounding road and train transportation networks using the ESRI Data and Maps product (ESRI 2008), and a 10-km buffer surrounding settlements using NLCD.

Lands maintained for recreational purposes are determined from analysis of the Protected Areas Database (U.S. Geological Survey 2012). The Protected Areas Database includes lands protected from conversion of natural habitats to anthropogenic uses and describes the protection status of these lands. Lands are considered managed that are protected from development if the regulations allow for extractive or recreational uses or suppression of

²³ All wetlands are considered managed in this Inventory with the exception of remote areas in Alaska. Distinguishing between managed and unmanaged wetlands in the conterminous United States and Hawaii is difficult due to limited data availability. Wetlands are not characterized within the NRI with information regarding water table management. Regardless, a planned improvement is underway to subdivide managed and unmanaged wetlands.

natural disturbance (e.g., forest lands with active fire protection). Lands that are protected from development and not accessible to human intervention, including no suppression of disturbances or extraction of resources, are not included in the managed land base.

Multiple data sources are used to determine lands with active resource extraction: Alaska Oil and Gas Information System (Alaska Oil and Gas Conservation Commission 2009), Alaska Resource Data File (U.S. Geological Survey 2012), Active Mines and Mineral Processing Plants (U.S. Geological Survey 2005), and *Coal Production and Preparation Report* (U.S. Energy Information Administration 2011). A buffer of 3,300 and 4,000 meters is established around petroleum extraction and mine locations, respectively, to account for the footprint of operation and impacts of activities on the surrounding landscape. The buffer size is based on visual analysis of disturbance to the landscape for approximately 130 petroleum extraction sites and 223 mines. After applying the criteria identified above, the resulting managed land area is overlaid on the NLCD to estimate the area of managed land by land use for both federal and non-federal lands in Alaska. The remaining land represents the unmanaged land base. The resulting spatial product is also used to identify NRI survey locations that are considered managed and unmanaged for the conterminous United States and Hawaii.²⁴

Approach for Combining Data Sources

The managed land base in the United States has been classified into the 36 IPCC land use/land-use conversion categories (Table 6-5) using definitions developed to meet national circumstances, while adhering to IPCC guidelines (2006).²⁵ In practice, the land was initially classified into land use subcategories within the NRI, FIA, and NLCD datasets, and then aggregated into the 36 broad land use and land-use change categories identified in IPCC (2006).

All three datasets provide information on forest land areas in the conterminous United States, but the area data from FIA serve as the official dataset for forest land. Therefore, another step in the analysis is to address the inconsistencies in the representation of the forest land among the three databases. NRI and FIA have different criteria for classifying forest land in addition to different sampling designs, leading to discrepancies in the resulting estimates of forest land area on non-federal land in the conterminous United States. Similarly, there are discrepancies between the NLCD and FIA data for defining and classifying forest land on federal lands. Any change in forest land area in the NRI and NLCD also requires a corresponding change in other land use areas because of the dependence between the forest land area and the amount of land designated as other land uses, such as the amount of grassland, cropland, and wetlands (i.e., areas for the individual land uses must sum to the total managed land area of the country).

FIA is the main database for forest statistics, and consequently, the NRI and NLCD are adjusted to achieve consistency with FIA estimates of forest land in the conterminous United States. Adjustments are made in the Forest Land Remaining Forest Land, Land Converted to Forest Land, and Forest Land converted to other uses (i.e., Grassland, Cropland, Settlements, Other Lands, and Wetlands). All adjustments are made at the state scale to address the discrepancies in areas associated with forest land and conversions to and from Forest Land. There are three steps in this process. The first step involves adjustments to Land Converted to Forest Land (Grassland, Cropland, Settlements, Other Lands, and Wetlands), followed by a second step in which there are adjustments in Forest Land converted to another land use (i.e., Grassland, Cropland, Settlements, Other Lands, and Wetlands), and the last step is to adjust Forest Land Remaining Forest Land.

In the first step, Land Converted to Forest Land in the NRI and NLCD are adjusted to match the state-level estimates in the FIA data for non-federal and federal Land Converted to Forest Land, respectively. FIA data have not provided specific land-use categories that are converted to forest land in the past, but rather a sum of all land

-

²⁴ The exception is cropland and settlement areas in the NRI, which are classified as managed, regardless of the managed land base obtained from the spatial analysis described in this section.

²⁵ Definitions are provided in the previous section.

converted to forest land.²⁶ The NRI and NLCD provide information on specific land-use conversions, such as Grassland Converted to Forest Land. Therefore, adjustments at the state level to NRI and NLCD are made proportional to the amount of specific land-use conversions into forest land for the state, prior to any further adjustments. For example, if 50 percent of the land-use change to forest land is associated with Grassland Converted to Forest Land in a state according to NRI or NLCD, then half of the discrepancy with FIA data in the area of Land Converted to Forest Land is addressed by increasing or decreasing the area in Grassland Converted to Forest Land. Moreover, any increase or decrease in Grassland Converted to Forest Land in NRI or NLCD is addressed by a corresponding change in the area of Grassland Remaining Grassland, so that the total amount of managed area is not changed within an individual state.

In the second step, state-level areas are adjusted in the NRI and NLCD to address discrepancies with FIA data for forest land converted to other uses. Similar to Land Converted to Forest Land, FIA have not provided information on the specific land-use changes in the past, 27 so areas associated with forest land conversion to other land uses in NRI and NLCD are adjusted proportional to the amount of area in each conversion class in these datasets.

In the final step, the area of Forest Land Remaining Forest Land in each state according to the NRI and NLCD is adjusted to match the FIA estimates for non-federal and federal land, respectively. It is assumed that the majority of the discrepancy in Forest Land Remaining Forest Land is associated with less-precise estimates of Grassland Remaining Grassland and Wetlands Remaining Wetlands in the NRI and NLCD. This step also assumes that there are no changes in the land-use conversion categories. Therefore, corresponding adjustments are made in the area estimates of Grassland Remaining Grassland and Wetlands Remaining Wetlands from the NRI and NLCD. This adjustment balances the change in Forest Land Remaining Forest Land area, which ensures no change in the overall amount of managed land within an individual state. The adjustments are based on the proportion of land within each of these land-use categories at the state level according to NRI and NLCD (i.e., a higher proportion of Grassland led to a larger adjustment in Grassland area).

The modified NRI data are then aggregated to provide the land use and land-use change data for non-federal lands in the conterminous United States, and the modified NLCD data are aggregated to provide the land use and landuse change data for federal lands. Data for all land uses in Hawaii are based on NRI for non-federal lands and on NLCD for federal lands. Land use data in Alaska are based on the NLCD data after adjusting this dataset to be consistent with forest land areas in the FIA (Table 6-6). The result is land use and land-use change data for the conterminous United States, Hawaii, and Alaska.

A summary of the details on the approach used to combine data sources for each land use are described below.

- Forest Land: Land representation for both non-federal and federal forest lands in the conterminous United States and Alaska are based on the FIA. FIA is used as the basis for both forest land area data as well as to estimate C stocks and fluxes on forest land in the conterminous United States and Alaska. FIA does have survey plots in Alaska that are used to determine the C stock changes, and the associated area data for this region are harmonized with NLCD using the methods described above. NRI is used in the current report to provide forest land areas on non-federal lands in Hawaii, and NLCD is used for federal lands. FIA data is being collected in Hawaii and U.S. Territories, however there is insufficient data to make population estimates for this Inventory.
- Cropland: Cropland is classified using the NRI, which covers all non-federal lands within 49 states (excluding Alaska), including state and local government-owned land as well as tribal lands. NRI is used as the basis for both cropland area data as well as to estimate soil C stocks and fluxes on cropland. NLCD is used to determine cropland area and soil C stock changes on federal lands in the conterminous United

Land Use, Land-Use Change, and Forestry

²⁶ The FIA program has started to collect data on the specific land uses that are converted to Forest Land, which will be further investigated and incorporated into a future Inventory.

²⁷ The FIA program has started to collect data on specific land uses following conversion from Forest Land, which will be further investigated and incorporated into a future Inventory.

States and Hawaii. NLCD is also used to determine croplands in Alaska, but C stock changes are not estimated for this region in the current Inventory.

- Grassland: Grassland on non-federal lands is classified using the NRI within 49 states (excluding Alaska), including state and local government-owned land as well as tribal lands. NRI is used as the basis for both grassland area data as well as to estimate soil C stocks and non-CO₂ greenhouse emissions on grassland. Grassland area and soil C stock changes are determined using the classification provided in the NLCD for federal land within the conterminous United States. NLCD is also used to estimate the areas of federal and non-federal grasslands in Alaska, and the federal grasslands in Hawaii, but the current Inventory does not include C stock changes in these areas.
- Wetlands: NRI captures wetlands on non-federal lands within 49 states (excluding Alaska), while the land representation data for federal wetlands and wetlands in Alaska are based on the NLCD.²⁸
- Settlements: NRI captures non-federal settlement area in 49 states (excluding Alaska). If areas of forest land or grassland under 10 acres (4.05 ha) are contained within settlements or urban areas, they are classified as settlements (urban) in the NRI database. If these parcels exceed the 10-acre (4.05 ha) threshold and are grassland, they are classified as grassland by NRI. Regardless of size, a forested area is classified as non-forest by FIA if it is located within an urban area. Land representation for settlements on federal lands and Alaska is based on the NLCD.
- Other Land: Any land that is not classified into one of the previous five land-use categories is categorized as other land using the NRI for non-federal areas in the conterminous United States and Hawaii and using the NLCD for the federal lands in all regions of the United States and for non-federal lands in Alaska.

Some lands can be classified into one or more categories due to multiple uses that meet the criteria of more than one definition. However, a ranking has been developed for assignment priority in these cases. The ranking process is from highest to lowest priority based on the following order:

Settlements > Cropland > Forest Land > Grassland > Wetlands > Other Land

Settlements are given the highest assignment priority because they are extremely heterogeneous with a mosaic of patches that include buildings, infrastructure, and travel corridors, but also open grass areas, forest patches, riparian areas, and gardens. The latter examples could be classified as grassland, forest land, wetlands, and cropland, respectively, but when located in close proximity to settlement areas, they tend to be managed in a unique manner compared to non-settlement areas. Consequently, these areas are assigned to the Settlements land-use category. Cropland is given the second assignment priority, because cropping practices tend to dominate management activities on areas used to produce food, forage, or fiber. The consequence of this ranking is that crops in rotation with pasture are classified as cropland, and land with woody plant cover that is used to produce crops (e.g., orchards) is classified as cropland, even though these areas may also meet the definitions of grassland or forest land, respectively. Similarly, wetlands are considered croplands if they are used for crop production, such as rice or cranberries. Forest land occurs next in the priority assignment because traditional forestry practices tend to be the focus of the management activity in areas with woody plant cover that are not croplands (e.g., orchards) or settlements (e.g., housing subdivisions with significant tree cover). Grassland occurs next in the ranking, while wetlands and then other land complete the list.

The assignment priority does not reflect the level of importance for reporting greenhouse gas emissions and removals on managed land, but is intended to classify all areas into a discrete land-use category. Currently, the IPCC does not make provisions in the guidelines for assigning land to multiple uses. For example, a wetland is classified as forest land if the area has sufficient tree cover to meet the stocking and stand size requirements.

²⁸ This analysis does not distinguish between managed and unmanaged wetlands except for remote areas in Alaska, but there is a planned improvement to subdivide managed and unmanaged wetlands for the entire land base.

Similarly, wetlands are classified as cropland if they are used for crop production, such as rice, or as grassland if they are composed principally of grasses, grass-like plants (i.e., sedges and rushes), forbs, or shrubs suitable for grazing and browsing. Regardless of the classification, emissions and removals from these areas should be included in the Inventory if the land is considered managed, and therefore impacted by anthropogenic activity in accordance with the guidance provided by the IPCC (2006).

QA/QC and Verification

The land base obtained from the NRI, FIA, and NLCD was compared to the Topologically Integrated Geographic Encoding and Referencing (TIGER) survey (U.S. Census Bureau 2010). The United States Census Bureau gathers data on the population and economy and has a database of land areas for the country. The area estimates of landuse categories, based on NRI, FIA, and NLCD, are obtained from remote sensing data instead of the land survey approach used by the United States Census Survey. The Census does not provide a time series of land-use change data or land management information, which is needed for estimating greenhouse gas emissions from land use and land-use change. Regardless, the Census does provide sufficient information to provide a quality assurance check on the Inventory data. There are 46 million more hectares of land in the United States according to the Census, compared to the total area estimate of 936 million hectares obtained from the combined NRI, FIA, and NLCD data. Much of this difference is associated with open waters in coastal regions and the Great Lakes, which is included in the TIGER Survey of the Census, but not included in the land representation using the NRI, FIA and NLCD. There is only a 0.4 percent difference when open water in coastal regions is removed from the TIGER data. General QC procedures for data gathering and data documentation also were applied consistent with the QA/QC and Verification Procedures described in Annex 8.

Recalculations Discussion

Major updates were made in this Inventory associated with the release of new land use and land cover data. The land representation data were recalculated from the previous Inventory with the following datasets: a) updated FIA data from 1990 to 2021 for the conterminous United States and Alaska, b) updated NRI data from 1990 to 2017 for the conterminous United States and Hawaii, and c) updated NLCD data for the conterminous United States from 2001 through 2019 and Alaska from 2001 through 2016. With these recalculations, managed forest land essentially remained the same as the previous Inventory across the time series from 1990 to 2021 according to the new FIA data. According to the new NRI and NLCD data, as well as harmonization of these data with the new FIA data (See section "Approach for Combining Data Sources"), grassland and settlements remained essentially unchanged from the previous Inventory and cropland, wetlands, and other land decreased by an average of 0.1 percent, 0.9 percent, and 5.8 percent, respectively.

Planned Improvements

Research is underway to harmonize NRI and FIA sampling frames to improve consistency and facilitate estimation using multi-frame sampling. This includes development of a common land use classification schema between the two land inventories that can be used in the harmonization process. These steps will allow for population estimation exclusive of auxiliary information (e.g., NLCD). The multi-frame sample will also serve as reference data for the development of spatially explicit and spatially continuous map products for each year in the Inventory time series. Another key planned improvement for the Inventory is to fully incorporate area data by land use type for U.S. Territories. Fortunately, most of the managed land in the United States is included in the current land use data, but a complete reporting of all lands in the United States is a key goal for the near future. Preliminary land use area data for U.S. Territories by land-use category are provided in Box 6-2.

Box 6-2: Preliminary Estimates of Land Use in U.S. Territories

Several programs have developed land cover maps for U.S. Territories using remote sensing imagery, including the Gap Analysis Program, Caribbean Land Cover project, National Land Cover Dataset (NLCD), USFS Pacific

Islands Imagery Project, and the National Oceanic and Atmospheric Administration (NOAA) Coastal Change Analysis Program (C-CAP). Land-cover data can be used to inform a land use classification if there is a time series to evaluate the dominate practices. For example, land that is principally used for timber production with tree cover over most of the time series is classified as forest land even if there are a few years of grass dominance following timber harvest. These products were reviewed and evaluated for use in the national Inventory as a step towards implementing a planned improvement to include U.S. Territories in the land representation for the Inventory. Recommendations are to use the NOAA C-CAP Regional Land Cover Database for the smaller island Territories (U.S. Virgin Islands, Guam, Northern Marianas Islands, and American Samoa) because this program is ongoing and therefore will be continually updated. The C-CAP product does not cover the entire territory of Puerto Rico, so the NLCD was used for this area. The final selection of land-cover products for these territories is still under discussion. Results are presented below (in hectares). The total land area of all U.S. Territories is 1.05 million hectares, representing 0.1 percent of the total land base for the United States (see Table 6-7).

Table 6-7: Total Land Area (Hectares) by Land Use Category for U.S. Territories

		U.S. Virgin		Northern Marianas	American	
	Puerto Rico	Islands	Guam	Islands	Samoa	Total
Cropland	19,712	138	236	289	389	20,764
Forest Land	404,004	13,107	24,650	25,761	15,440	482,962
Grasslands	299,714	12,148	15,449	13,636	1,830	342,777
Other Land	5,502	1,006	1,141	5,186	298	13,133
Settlements	130,330	7,650	11,146	3,637	1,734	154,496
Wetlands	24,525	4,748	1,633	260	87	31,252
Total	883,788	38,796	54,255	48,769	19,777	1,045,385

Note: Totals may not sum due to independent rounding.

Methods in the 2013 Supplement to the 2006 Guidelines for National Greenhouse Gas Inventories: Wetlands (IPCC 2014) have been applied to estimate emissions and removals from coastal wetlands. Specifically, greenhouse gas emissions from coastal wetlands have been developed for the Inventory using the NOAA C-CAP land cover product. The NOAA C-CAP product is not used directly in the land representation analysis, however, so a planned improvement for future Inventories is to reconcile the coastal wetlands data from the C-CAP product with the wetlands area data provided in the NRI, FIA and NLCD. Estimates from flooded lands are also included in this Inventory, but data are not directly used in the land representation analysis at this time; this is a planned improvement to includes for future inventories. In addition, the current Inventory does not include a classification of managed and unmanaged wetlands, except for remote areas in Alaska. Consequently, there is a planned improvement to classify managed and unmanaged wetlands for the conterminous United States and Hawaii, and more detailed wetlands datasets will be evaluated and integrated into the analysis to meet this objective.

6.2 Forest Land Remaining Forest Land (CRF Category 4A1)

Changes in Forest Carbon Stocks (CRF Category 4A1)

Delineation of Carbon Pools

For estimating carbon (C) stocks or stock change (flux), C in forest ecosystems can be divided into the following five storage pools (IPCC 2006):

- Aboveground biomass, which includes all living biomass above the soil including stem, stump, branches, bark, seeds, and foliage. This category includes live understory.
- Belowground biomass, which includes all living biomass of coarse living roots greater than 2 millimeters (mm) diameter.
- Dead wood, which includes all non-living woody biomass either standing, lying on the ground (but not
 including litter), or in the soil.
- Litter, which includes all duff, humus, and fine woody debris above the mineral soil as well as woody fragments with diameters of up to 7.5 cm.
- Soil organic C (SOC), including all organic material in soil to a depth of 1 meter but excluding the coarse roots of the belowground pools.

In addition, there are two harvested wood pools included when estimating C flux:

- Harvested wood products (HWP) in use.
- HWP in solid waste disposal sites (SWDS).

Forest Carbon Cycle

Carbon is continuously cycled among the previously defined C storage pools and the atmosphere as a result of biogeochemical processes in forests (e.g., photosynthesis, respiration, decomposition, and disturbances such as fires or pest outbreaks) and anthropogenic activities (e.g., harvesting, thinning, and replanting). As trees photosynthesize and grow, C is removed from the atmosphere and stored in living tree biomass. As trees die and otherwise deposit litter and debris on the forest floor, C is released to the atmosphere and is also transferred to the litter, dead wood, and soil pools by organisms that facilitate decomposition.

The net change in forest C is not equivalent to the net flux between forests and the atmosphere because timber harvests do not cause an immediate flux of all harvested biomass C to the atmosphere. Instead, harvesting transfers a portion of the C stored in wood to a "product pool." Once in a product pool, the C is emitted over time as CO₂ in the case of decomposition and as CO₂, CH₄, N₂O, CO, and NO_x when the wood product combusts. The rate of emission varies considerably among different product pools. For example, if timber is harvested to produce energy, combustion releases C immediately, and these emissions are reported for information purposes in the Energy sector while the harvest (i.e., the associated reduction in forest C stocks) and subsequent combustion are implicitly estimated in the Land Use, Land-Use Change, and Forestry (LULUCF) sector (i.e., the portion of harvested timber combusted to produce energy does not enter the HWP pools). Conversely, if timber is harvested and used as lumber in a house, it may be many decades or even centuries before the lumber decays and C is released to the atmosphere. If wood products are disposed of in SWDS, the C contained in the wood may be released many years

or decades later or may be stored almost permanently in the SWDS. These latter fluxes, with the exception of CH₄ from wood in SWDS, which is included in the Waste sector, are also estimated in the LULUCF sector.

Net Change in Carbon Stocks within Forest Land of the United States

This section describes the general method for quantifying the net changes in C stocks in the five C storage pools and two harvested wood pools (a more detailed description of the methods and data is provided in Annex 3.13). The underlying methodology for determining C stock and stock change relies on data from the national forest inventory (NFI) conducted by the Forest Inventory and Analysis (FIA) program within the USDA Forest Service. The annual NFI is implemented across all U.S. Forest lands within the conterminous 48 states and Alaska and inventories have been initiated in Hawaii and some of the U.S. Territories. The methods for estimation and monitoring are continuously improved and these improvements are reflected in the C estimates (Domke et al. 2022). First, the total C stocks are estimated for each C storage pool at the individual NFI plot, next the annual net changes in C stocks for each pool at the population are estimated, and then the changes in stocks are summed for all pools to estimate total net flux at the population level (e.g., U.S. state). Changes in C stocks from disturbances, such natural disturbances (e.g., wildfires, insects/disease, wind) or harvesting, are included in the net changes (See Box 6-3 for more information). For instance, an inventory conducted after a fire implicitly includes only the C stocks remaining on the NFI plot. The IPCC (2006) recommends estimating changes in C stocks from forest lands according to several land-use types and conversions, specifically Forest Land Remaining Forest Land and Land Converted to Forest Land, with the former being lands that have been forest lands for 20 years or longer and the latter being lands (i.e., croplands, grassland, wetlands, settlements and other lands) that have been converted to forest lands for less than 20 years. The methods and data used to delineate forest C stock changes by these two categories continue to improve and in order to facilitate this delineation, a combination of modeling approaches for C estimation were used in this Inventory.

Forest Area in the United States

Approximately 32 percent of the U.S. land area is estimated to be forested based on the U.S. definition of forest land as provided in Section 6.1 Representation of the U.S. Land Base. All annual NFI plots included in the public FIA database as of August 2022 (which includes data collected through 2021 - note that the ongoing COVID 19 pandemic has resulted in delays in data collection in many states) were used in this Inventory. The NFIs from the conterminous United States (USDA Forest Service 2022a, 2022b) and Alaska comprise an estimated 280 million hectares of forest land that are considered managed and are included in the current Inventory. Some differences also exist in forest land area estimates from the latest update to the Resources Planning Act (RPA) Assessment (Oswalt et al. 2019) and the forest land area estimates included in this report, which are based on the annual NFI data through 2021 for all states (USDA Forest Service 2022b; Nelson et al. 2020). Sufficient annual NFI data are not yet available for Hawaii and the U.S. Territories to include them in this section of the Inventory but estimates of these areas are included in Oswalt et al. (2019). While Hawaii and U.S. Territories have relatively small areas of forest land and thus may not substantially influence the overall C budget for forest land, these regions will be added to the forest C estimates as sufficient data become available. Since Hawaii was not included in this section of the current Inventory, this results in small differences in the area estimates reported in this section and those reported in Section 6.1 Representation of the U.S. Land Base. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1).²⁹ Agroforestry systems that meet the definition of forest land are also not currently included in the current Inventory since they are not explicitly

6-26 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

²⁹ See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land.

inventoried (i.e., classified as an agroforestry system) by either the FIA program or the Natural Resources Inventory (NRI)³⁰ of the USDA Natural Resources Conservation Service (Perry et al. 2005).

An estimated 67 percent (208 million hectares) of U.S. forests in Alaska, Hawaii and the conterminous United States are classified as timberland, meaning they meet minimum levels of productivity and have not been removed from production. Approximately ten percent of Alaska forest land and 73 percent of forest land in the conterminous United States are classified as timberland. Of the remaining non-timberland, nearly 33 million hectares are reserved forest lands (withdrawn by law from management for production of wood products) and 102 million hectares are lower productivity forest lands (Oswalt et al. 2019). Historically, the timberlands in the conterminous 48 states have been more frequently or intensively surveyed than the forest lands removed from production because they do not meet the minimum level of productivity.

Since the late 1980s, gross forest land area in Alaska, Hawaii, and the conterminous United States has increased by about 13 million hectares (Oswalt et al. 2019). The southern region of the United States contains the most forest land (Figure 6-4). A substantial portion of this accrued forest land is from the conversion of abandoned croplands to forest (e.g., Woodall et al. 2015b). Estimated forest land area in the conterminous United States and Alaska represented in this Inventory is stable, but there are substantial conversions as described in Section 6.1 Representation of the U.S. Land Base and each of the land conversion sections for each land-use category (e.g., Land Converted to Cropland, Land Converted to Grassland). The major influences on the net C flux from forest land across the 1990 to 2021 time series are management activities, natural disturbance, particularly wildfire, and the ongoing impacts of current and previous land-use conversions. These activities affect the net flux of C by altering the amount of C stored in forest ecosystems and also the area converted to forest land. For example, intensified management of forests that leads to an increased rate of growth of aboveground biomass (and possible changes to the other C storage pools) may increase the eventual biomass density of the forest, thereby increasing the uptake and storage of C in the aboveground biomass pool.³¹ Though harvesting forests removes much of the C in aboveground biomass (and possibly changes C density in other pools), on average, the estimated volume of annual net growth in aboveground tree biomass in the conterminous United States is essentially twice the volume of annual removals on timberlands (Oswalt et al. 2019). The net effects of forest management and changes in Forest Land Remaining Forest Land are captured in the estimates of C stocks and fluxes presented in this section.

-

³⁰ The Natural Resources Inventory of the USDA Natural Resources Conservation Service is described in Section 6.1 Representation of the U.S. Land Base.

³¹ The term "biomass density" refers to the mass of live vegetation per unit area. It is usually measured on a dry-weight basis. A carbon fraction of 0.5 is used to convert dry biomass to C (USDA Forest Service 2022d).

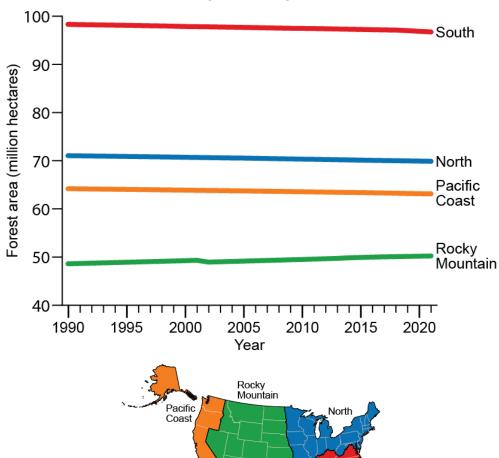


Figure 6-4: Changes in Forest Area by Region for Forest Land Remaining Forest Land in the conterminous United States and Alaska (1990-2021)

Forest Carbon Stocks and Stock Change

In the Forest Land Remaining Forest Land category, forest management practices, the regeneration of forest areas cleared more than 20 years prior to the reporting year, and timber harvesting have resulted in net removal (i.e., net sequestration or accumulation) of C each year from 1990 through 2021. The rate of forest clearing in the 17th century following European settlement had slowed by the late 19th century. Through the later part of the 20th century, many areas of previously forested land in the United States were allowed to revert to forests or were actively reforested. The impacts of these land-use changes still influence C fluxes from these forest lands. More recently, the 1970s and 1980s saw a resurgence of federally sponsored forest management programs (e.g., the Forestry Incentive Program) and soil conservation programs (e.g., the Conservation Reserve Program), which have focused on tree planting, improving timber management activities, combating soil erosion, and converting marginal cropland to forests. In addition to forest regeneration and management, forest harvests and natural disturbance have also affected net C fluxes. Because most of the timber harvested from U.S. forest land is used in wood products, and many discarded wood products are disposed of in SWDS rather than by incineration, significant quantities of C in harvested wood are transferred to these long-term storage pools rather than being released rapidly to the atmosphere (Skog 2008). By maintaining current harvesting practices and regeneration activities on forested lands, along with continued input of harvested products into the HWP pool, C stocks in the

Forest Land Remaining Forest Land category are likely to continue to increase in the near term, though possibly at a lower rate. Changes in C stocks in the forest ecosystem and harvested wood pools associated with Forest Land Remaining Forest Land were estimated to result in net removal of 695.4 MMT CO₂ Eq. (189.6 MMT C) in 2021 (Table 6-8, Table 6-9, Table A-192, Table A-193 and state-level estimates in Table A-196). The estimated net uptake of C in the Forest Ecosystem was 592.5 MMT CO₂ Eq. (161.6 MMT C) in 2021 (Table 6-8 and Table 6-9). The majority of this uptake in 2021, 409.1 MMT CO₂ Eq. (111.6 MMT C), was from aboveground biomass. Overall, estimates of average C density in forest ecosystems (including all pools) increased consistently over the time series with an average of approximately 192 MT C ha⁻¹ from 1990 to 2021. This was calculated by dividing the Forest Land area estimates by Forest Ecosystem C Stock estimates for every year (see Table 6-10 and Table A-194) and then calculating the mean across the entire time series, i.e., 1990 through 2021. The increasing forest ecosystem C density, when combined with relatively stable forest area, results in net C accumulation over time. Aboveground live biomass is responsible for the majority of net C uptake among all forest ecosystem pools (Figure 6-5). These increases may be influenced in some regions by reductions in C density or forest land area due to natural disturbances (e.g., wildfire, weather, insects/disease), particularly in Alaska. The inclusion of all managed forest land in Alaska has increased the interannual variability in carbon stock change estimates over the time series, and much of this variability can be attributed to severe fire years (e.g., 2019). The distribution of carbon in forest ecosystems in Alaska is substantially different from forests in the conterminous United States. In Alaska, more than 11 percent of forest ecosystem C is stored in the litter carbon pool whereas in the conterminous United States, only 7 percent of the total ecosystem C stocks are in the litter pool. Much of the litter material in forest ecosystems is combusted during fire (IPCC 2006) leading to substantial C losses in this pool during severe fire years (Figure 6-5, Table A-194).

The estimated net uptake of C in HWP was 102.8 MMT CO₂ Eq. (28.0 MMT C) in 2021 (Table 6-8, Table 6-9, Table A-192, and Table A-193). The majority of this uptake, 65.1 MMT CO₂ Eq. (17.7 MMT C), was from wood and paper in SWDS. Products in use accounted for an estimated 37.8 MMT CO₂ Eq. (10.3 MMT C) in 2021.

Table 6-8: Net CO₂ Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT CO₂ Eq.)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Forest Ecosystem	(697.7)	(608.2)	(610.4)	(610.5)	(559.8)	(610.8)	(592.5)
Aboveground							
Biomass	(499.1)	(443.8)	(425.9)	(428.0)	(410.8)	(419.0)	(409.1)
Belowground							
Biomass	(101.8)	(89.8)	(84.5)	(85.1)	(81.6)	(83.1)	(81.1)
Dead Wood	(100.8)	(97.9)	(100.0)	(102.7)	(98.2)	(102.3)	(101.1)
Litter	0.9	22.5	(2.0)	1.6	30.4	(1.9)	1.9
Soil (Mineral)	3.2	0.5	(0.1)	0.6	0.7	(5.4)	(4.0)
Soil (Organic)	(0.8)	(0.4)	1.4	2.3	(1.1)	0.1	0.1
Drained Organic							
Soila	0.8	0.8	0.8	0.8	0.8	0.8	0.8
Harvested Wood	(123.8)	(106.0)	(100.3)	(94.0)	(89.6)	(96.6)	(102.8)
Products in Use	(54.8)	(42.6)	(34.9)	(28.9)	(25.1)	(32.0)	(37.8)
SWDS	(69.0)	(63.4)	(65.3)	(65.1)	(64.5)	(64.6)	(65.1)
Total Net Flux	(821.4)	(714.2)	(710.7)	(704.4)	(649.3)	(707.4)	(695.4)

^a These estimates include C stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land. See the section below on CO₂, CH₄, and N₂O Emissions from Drained Organic Soils for the methodology used to estimate the CO₂ emissions from drained organic soils. Also, Table 6-20 and 6-21 for non-CO₂ emissions from drainage of organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land.

Notes: Forest ecosystem C stock changes do not include forest stocks in U.S. Territories because managed

forest land for U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. However, managed forest land area for Hawaii is included in Section 6.1 Representation of the U.S. Land Base, so there are small differences in the forest land area estimates in this Section and Section 6.1. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land. The forest ecosystem C stock changes do not include trees on nonforest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). Forest ecosystem C stocks on managed forest land in Alaska were compiled using the gain-loss method as described in Annex 3.13. Parentheses indicate net C uptake (i.e., a net removal of C from the atmosphere). Total net flux is an estimate of the actual net flux between the total forest C pool and the atmosphere. Harvested wood estimates are based on results from annual surveys and models. Totals may not sum due to independent rounding.

Table 6-9: Net C Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Forest Ecosystem	(190.3)	(165.9)	(166.5)	(166.5)	(152.7)	(166.6)	(161.6)
Aboveground Biomass	(136.1)	(121.0)	(116.1)	(116.7)	(112.0)	(114.3)	(111.6)
Belowground Biomass	(27.8)	(24.5)	(23.0)	(23.2)	(22.3)	(22.7)	(22.1)
Dead Wood	(27.5)	(26.7)	(27.3)	(28.0)	(26.8)	(27.9)	(27.6)
Litter	0.2	6.1	(0.6)	0.4	8.3	(0.5)	0.5
Soil (Mineral)	0.9	0.1	(0.0)	0.2	0.2	(1.5)	(1.1)
Soil (Organic)	(0.2)	(0.1)	0.4	0.6	(0.3)	0.0	0.0
Drained Organic Soil ^a	0.21	0.2	0.2	0.2	0.2	0.2	0.2
Harvested Wood	(33.8)	(28.9)	(27.3)	(25.6)	(24.4)	(26.3)	(28.0)
Products in Use	(14.9)	(11.6)	(9.5)	(7.9)	(6.8)	(8.7)	(10.3)
SWDS	(18.8)	(17.3)	(17.8)	(17.8)	(17.6)	(17.6)	(17.7)
Total Net Flux	(224.0)	(194.8)	(193.8)	(192.1)	(177.1)	(192.9)	(189.6)

^a These estimates include carbon stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land. See the section below on CO₂, CH₄, and N₂O Emissions from Drained Organic Soils for the methodology used to estimate the C flux from drained organic soils. Also, see Table 6-20 and 6-21 for greenhouse gas emissions from non-CO₂ gases changes from drainage of organic soils from Forest Land Remaining Forest Land and Land Converted to Forest Land.

Notes: Forest ecosystem C stock changes do not include forest stocks in U.S. Territories because managed forest land for U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. However, managed forest land area for Hawaii is included in 6.1 Representation of the U.S. Land Base so there are small differences in the forest land area estimates in this Section and Section 6.1. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land. The forest ecosystem C stock changes do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). Forest ecosystem C stocks on managed forest land in Alaska were compiled using the gain-loss method as described in Annex 3.13. Parentheses indicate net C uptake (i.e., a net removal of C from the atmosphere). Total net flux is an estimate of the actual net flux between the total forest C pool and the atmosphere. Harvested wood estimates are based on results from annual surveys and models. Totals may not sum due to independent rounding.

Stock estimates for forest ecosystem and harvested wood C storage pools are presented in Table 6-10. Together, the estimated aboveground biomass and soil C pools account for a large proportion of total forest ecosystem C stocks. Forest land area estimates are also provided in Table 6-10, but these do not precisely match those in Section 6.1 Representation of the U.S. Land Base for Forest Land Remaining Forest Land. This is because the forest land area estimates in Table 6-10 only include managed forest land in the conterminous U.S. and Alaska while the area estimates in Section 6.1 also include all managed forest land in Hawaii. Differences also exist because forest land area estimates are based on the latest NFI data through 2021, and woodland areas previously included as forest land have been separated and included in the Grassland categories in this Inventory. ³²

Table 6-10: Forest Area (1,000 ha) and C Stocks in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

	1990	2005	2018	2019	2020	2021	2022
Forest Area (1,000 ha)	282,150	281,096	280,467	280,299	280,120	279,962	279,800
Carbon Pools (MMT C)							
Forest Ecosystem	51,354	54,098	56,303	56,470	56,623	56,790	56,951
Aboveground Biomass	11,899	13,849	15,406	15,523	15,635	15,749	15,861
Belowground Biomass	2,344	2,740	3,052	3,076	3,098	3,121	3,143
Dead Wood	1,948	2,359	2,717	2,745	2,771	2,799	2,827
Litter	3,929	3,922	3,896	3,896	3,888	3,888	3,888
Soil (Mineral)	25,920	25,911	25,914	25,914	25,914	25,915	25,916
Soil (Organic)	5,315	5,318	5,318	5,317	5,317	5,317	5,317
Harvested Wood	1,895	2,353	2,645	2,671	2,695	2,721	2,749
Products in Use	1,249	1,447	1,516	1,523	1,530	1,539	1,549
SWDS	646	906	1,129	1,147	1,165	1,182	1,200
Total C Stock	53,249	56,451	58,948	59,141	59,318	59,511	59,701

Notes: Forest area and C stock estimates include all Forest Land Remaining Forest Land in the conterminous 48 states and Alaska. Forest ecosystem C stocks do not include forest stocks in U.S. Territories because managed forest land for U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stocks do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. However, managed forest land area for Hawaii is included in Section 6.1 Representation of the U.S. Land Base so there are small differences in the forest land area estimates in this Section and Section 6.1. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land. The forest ecosystem C stocks do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). Forest ecosystem C stocks on managed forest land in Alaska were compiled using the gain-loss method as described in Annex 3.13. Harvested wood product stocks include exports, even if the logs are processed in other countries, and exclude imports. Harvested wood estimates are based on results from annual surveys and models. Totals may not sum due to independent rounding. Population estimates compiled using FIA data are assumed to represent stocks as of January 1 of the inventory year. Flux is the net annual change in stock. Thus, an estimate of flux for 2021 requires estimates of C stocks for 2021 and 2022.

-

³² See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land.

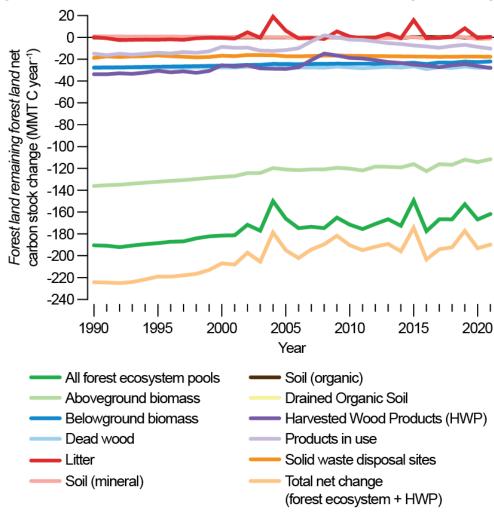


Figure 6-5: Estimated Net Annual Changes in C Stocks for All C Pools in Forest Land Remaining Forest Land in the Conterminous United States and Alaska (1990-2021)

Box 6-3: CO₂ Emissions from Forest Fires

As stated previously, the forest inventory approach implicitly includes all C losses due to disturbances such as forest fires, because only C remaining in the forest is estimated. Net C stock change is estimated by subtracting consecutive C stock estimates. A forest fire disturbance removes C from the forest. The inventory data from the NFI on which net C stock estimates are based already reflect this C loss. Therefore, estimates of net annual changes in C stocks for U.S. forest land already includes CO₂ emissions from forest fires occurring in the conterminous states as well as the portion of managed forest lands in Alaska. Because it is of interest to quantify the magnitude of CO₂ emissions from fire disturbance, these separate estimates are highlighted here. Note that these CO₂ estimates are based on the same methodology as applied for the non-CO₂ greenhouse gas emissions from forest fires that are also quantified in a separate section below as required by IPCC Guidance and UNFCCC reporting requirements.

Emissions estimates are developed using IPCC (2006) methodology and based on U.S.-specific data and models to quantify the primary fire-specific components: area burned; availability and combustibility of fuel; fire severity (or consumption); and CO_2 and non- CO_2 emissions. Estimated CO_2 emissions for fires on forest lands in the conterminous U.S. and in Alaska for 2021 are 203 MMT CO_2 per year (Table 6-11). This estimate is an

embedded component of the net annual forest C stock change estimates provided previously (i.e., Table 6-9), but this separate approach to estimating CO_2 emissions is necessary in order to associate these emissions with fire. See the discussion in Annex 3.13 for more details on this methodology. Note that in Alaska, a portion of the forest lands are considered unmanaged, therefore the estimates for Alaska provided in Table 6-11 include only managed forest land within the state, which is consistent with C stock change estimates provided above.

Table 6-11: Estimates of CO₂ (MMT per Year) Emissions^a from Forest Fires in the Conterminous 48 States and Alaska

	CO ₂ emitted from fires on forest land in the Conterminous 48	CO ₂ emitted from fires on forest land in	Total CO₂ emitted
Year	States (MMT yr ⁻¹)	Alaska (MM Tyr ⁻¹)	(MMTyr ⁻¹)
1990	13.6	38.6	52.2
2005	31.1	137.4	168.4
2017	119.0	4.5	123.5
2018	87.4	7.6	95.0
2019	22.3	77.9	100.2
2020	181.2	1.6	182.8
2021	196.6	5.9	202.6

^a These emissions have already been included in the estimates of net annual changes in C stocks, which include the amount sequestered minus any emissions, including the assumption that combusted wood may continue to decay through time. Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The methodology described herein is consistent with the 2006 IPCC Guidelines. Forest ecosystem C stocks and net annual C stock change were determined according to the stock-difference method for the conterminous United States, which involved applying C estimation factors to annual forest inventories across time to obtain C stocks and then subtracting between the years to obtain the stock change. The gain-loss method was used to estimate C stocks and net annual C stock changes in Alaska. The approaches for estimating carbon stocks and stock changes on Forest Land Remaining Forest Land are described in Annex 3.13. All annual NFI plots available in the public FIA database (USDA Forest Service 2022b) were used in the current Inventory. Additionally, NFI plots established and measured in 2014 as part of a pilot inventory in interior Alaska were also included in this Inventory as were plots established and measured since 2015 as part of the operational NFI in interior Alaska. Some of the data from the pilot and operational NFI in interior Alaska are not yet available in the public FIA database. Only plots which meet the definition of forest land (see Section 6.1 Representation of the U.S. Land Base) are measured in the NFI; as part of the pre-field process in the FIA program, all plots or portions of plots (i.e., conditions) are classified into a landuse category. This land use information on each forest and non-forest plot was used to estimate forest land area and land converted to and from forest land over the time series. The estimates in this section of the report are based on land use information from the NFI and they may differ from the other land-use categories where area estimates reported in the Land Representation were not updated (see Section 6.1 Representation of the U.S. Land Base). Further, Hawaii was not included in this section of the current Inventory, which also contributes to small differences in the area estimates reported in this section and those reported in Section 6.1 Representation of the U.S. Land Base (See Annex 3.13 for details on differences).

To implement the stock-difference approach, forest land conditions in the conterminous United States were observed on NFI plots at time t_0 and at a subsequent time t_1 = t_0 +s, where s is the time step (time measured in years) and is indexed by discrete (e.g., 5 year) forest age classes. The inventory from t_0 to t_1 was then projected to 2021. This projection approach requires simulating changes in the age-class distribution resulting from forest aging

and disturbance events and then applying C density estimates for each age class to obtain population estimates for the nation. In cases where there are t₁ estimates in the last year (e.g., 2021) of the NFI no projections are necessary for those plots. To implement the gain-loss approach in Alaska, forest land conditions in Alaska were observed on NFI plots from 2004 to 2021. Plot-level data from the NFI were harmonized with auxiliary data describing climate, forest structure, disturbance, and other site-specific conditions to develop non-parametric models to predict carbon stocks by forest ecosystem carbon pool as well as fluxes over the entire inventory period, 1990 to 2021. First, carbon stocks for each forest ecosystem carbon pool were predicted for the year 2016 for all base intensity NFI plot locations (each plot representing approximately 2,403 ha) in coastal southeast and southcentral Alaska and for 1/5 intensity plots in interior Alaska (each plot representing 12,015 ha). Next, the chronosequence of sampled NFI plots and auxiliary information (e.g., climate, forest structure, disturbance, and other site-specific data) were used to predict annual gains and losses for each forest ecosystem carbon pool. The annual gains and losses were then combined with the stock estimates and disturbance information to compile plot- and population-level carbon stocks and fluxes for each year from 1990 to 2021. To estimate C stock changes in harvested wood, estimates were based on factors such as the allocation of wood to various primary and end-use products as well as half-life (the time at which half of the amount placed in use will have been discarded from use) and expected disposition (e.g., product pool, SWDS, combustion). An overview of the different methodologies and data sources used to estimate the C in forest ecosystems within the conterminous states and Alaska and harvested wood products for all of the United States is provided below. See Annex 3.13 for details and additional information related to the methods and data.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. Details on the emission/removal trends and methodologies through time are described in more detail in the Introduction and Methodology sections.

Forest Ecosystem Carbon from Forest Inventory

The United States applied the compilation approach described in Woodall et al. (2015a) for the current Inventory which removes the older periodic inventory data, which may be inconsistent with annual inventory data, from the estimation procedures. This approach enables the delineation of forest C accumulation by forest growth, land-use change, and natural disturbances such as fire. Development will continue on a system that attributes changes in forest C to disturbances and delineates Land Converted to Forest Land from Forest Land Remaining Forest Land. As part of this development, C pool science will continue and will be expanded to improve the estimates of C stock transfers from forest land to other land uses and include techniques to better identify land-use change (see the Planned Improvements section below).

Unfortunately, the annual FIA inventory system does not extend into the 1970s, necessitating the adoption of a system to estimate carbon stocks prior to the establishment of the annual forest inventory. The estimation of carbon stocks prior to the annual national forest inventory consisted of a modeling framework comprised of a forest dynamics module (age transition matrices) and a land use dynamics module (land area transition matrices). The forest dynamics module assesses forest uptake, forest aging, and disturbance effects (e.g., disturbances such as wind, fire, and floods identified by foresters on inventory plots). The land use dynamics module assesses C stock transfers associated with afforestation and deforestation (Woodall et al. 2015b). Both modules are developed from land use area statistics and C stock change or C stock transfer by age class. The required inputs are estimated from more than 625,000 forest and non-forest observations recorded in the FIA national database (U.S. Forest Service 2022a, b, c). Model predictions prior to the annual inventory period are constructed from the estimation system using the annual estimates. The estimation system is driven by the annual forest inventory system conducted by the FIA program (Frayer and Furnival 1999; Bechtold and Patterson 2005; USDA Forest Service 2022d, 2022a). The FIA program relies on a rotating panel statistical design with a sampling intensity of one 674.5 m² ground plot per 2,403 ha of land and water area. A five or seven-panel design, with 20 percent or 14.3 percent of the field plots typically measured each year within a state, is used in the eastern United States and a ten-panel design, with typically 10 percent of the field plots measured each year within a state, is used in the western United States. The interpenetrating hexagonal design across the U.S. landscape enables the sampling of plots at various intensities in a spatially and temporally unbiased manner. Typically, tree and site attributes are measured with

higher sample intensity while other ecosystem attributes such as downed dead wood are sampled during summer months at lower intensities. The first step in incorporating FIA data into the estimation system is to identify annual inventory datasets by state. Inventories include data collected on permanent inventory plots on forest lands and were organized as separate datasets, each representing a complete inventory, or survey, of an individual state at a specified time. Many of the annual inventories reported for states are represented as "moving window" averages, which mean that a portion—but not all—of the previous year's inventory is updated each year (USDA Forest Service 2022d). Forest C estimates are organized according to these state surveys, and the frequency of surveys varies by state.

Using this FIA data, separate estimates were prepared for the five C storage pools identified by IPCC (2006) and described above. All estimates were based on data collected from the extensive array of permanent, annual forest inventory plots and associated models (e.g., live tree belowground biomass) in the United States (USDA Forest Service 2022b, 2022c). Carbon conversion factors were applied at the disaggregated level of each inventory plot and then appropriately expanded to population estimates.

Carbon in Biomass

Live tree C pools include aboveground and belowground (coarse root) biomass of live trees with diameter at breast height (dbh) of at least 2.54 cm at 1.37 m above the litter. Separate estimates were made for above- and belowground biomass components. If inventory plots included data on individual trees, aboveground and belowground (coarse roots) tree C was based on Woodall et al. (2011a), which is also known as the component ratio method (CRM), and is a function of tree volume, species, and diameter. An additional component of foliage, which was not explicitly included in Woodall et al. (2011a), was added to each tree following the same CRM method.

Understory vegetation is a minor component of biomass, which is defined in the FIA program as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density were based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003). Understory biomass represented over 1 percent of C in biomass, but its contribution rarely exceeded 2 percent of the total carbon stocks or stock changes across all forest ecosystem C pools each year.

Carbon in Dead Organic Matter

Dead organic matter is calculated as three separate pools—standing dead trees, downed dead wood, and litter—with C stocks estimated from sample data or from models as described below. The standing dead tree C pool includes aboveground and belowground (coarse root) biomass for trees of at least 12.7 cm dbh. Calculations followed the basic method applied to live trees (Woodall et al. 2011a) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). Downed dead wood estimates are based on measurement of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008; Woodall et al. 2013). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots are measured for litter C. A modeling approach, using litter C measurements from FIA plots (Domke et al. 2016), was used to estimate litter C for every FIA plot used in the estimation framework.

Carbon in Forest Soil

Soil carbon is the largest terrestrial C sink with much of that C in forest ecosystems. The FIA program has been consistently measuring soil attributes as part of the annual inventory since 2001 and has amassed an extensive

inventory of soil measurement data on forest land in the conterminous U.S. and coastal Alaska (O'Neill et al. 2005). Observations of mineral and organic soil C on forest land from the FIA program and the International Soil Carbon Monitoring Network were used to develop and implement a modeling approach that enabled the prediction of mineral and organic (i.e., undrained organic soils) soil C to a depth of 100 cm from empirical measurements to a depth of 20 cm and included site-, stand-, and climate-specific variables that yield predictions of soil C stocks specific to forest land in the United States (Domke et al. 2017). This new approach allowed for separation of mineral and organic soils, the latter also referred to as Histosols, in the Forest Land Remaining Forest Land category. Note that mineral and organic (i.e., undrained organic soils) soil C stock changes are reported to a depth of 100 cm for Forest Land Remaining Forest Land to remain consistent with past reporting in this category, however for consistency across land-use categories, mineral (e.g., cropland, grassland, settlements) soil C is reported to a depth of 30 cm in Section 6.3 Land Converted to Forest Land. Estimates of C stock changes from organic soils shown in Table 6-8 and Table 6-9 include the emissions from drained organic forest soils, and the methods used to develop these estimates can be found in the Drained Organic Soils section below.

Harvested Wood Carbon

Estimates of the HWP contribution to forest C sinks and emissions (hereafter called "HWP contribution") were based on methods described in Skog (2008) using the WOODCARB II model. These methods are based on IPCC (2006) guidance for estimating the HWP contribution. IPCC (2006) provides methods that allow for reporting of the HWP contribution using one of several different methodological approaches: Production, stock change and atmospheric flow, as well as a default method that assumes there is no change in HWP C stocks (see Annex 3.13 for more details about each approach). The United States uses the production approach to report HWP contribution. Under the production approach, C in exported wood was estimated as if it remains in the United States, and C in imported wood was not included in the estimates. Though reported U.S. HWP estimates are based on the production approach, estimates resulting from use of the two alternative approaches, the stock change and atmospheric flow approaches, are also presented for comparison (see Annex 3.13). Annual estimates of change were calculated by tracking the annual estimated additions to and removals from the pool of products held in end uses (i.e., products in use such as housing or publications) and the pool of products held in SWDS. The C loss from harvest is reported in the Forest Ecosystem component of the Forest Land Remaining Forest Land and Land Converted to Forest Land sections and for informational purposes in the Energy sector, but the non-CO₂ emissions associated with biomass energy are included in the Energy sector emissions (see Chapter 3). EPA includes HWP within the forest chapter because forests are the source of wood that goes into the HWP estimates.

Solidwood products include lumber and panels. End-use categories for solidwood include single and multifamily housing, alteration and repair of housing, and other end uses. There is one product category and one end-use category for paper. Additions to and removals from pools were tracked beginning in 1900, with the exception of additions of softwood lumber to housing, which began in 1800. Solidwood and paper product production and trade data were taken from USDA Forest Service and other sources (Hair and Ulrich 1963; Hair 1958; USDC Bureau of Census 1976; Ulrich 1985, 1989; Steer 1948; AF&PA 2006a, 2006b; Howard 2003, 2007; Howard and Jones 2016; Howard and Liang 2019). Estimates for disposal of products reflects the change over time in the fraction of products discarded to SWDS (as opposed to burning or recycling) and the fraction of SWDS that were in sanitary landfills versus dumps.

There are five annual HWP variables that were used in varying combinations to estimate HWP contribution using any one of the three main approaches listed above. These are:

- (1A) annual change of C in wood and paper products in use in the United States,
- (1B) annual change of C in wood and paper products in SWDS in the United States,
- (2A) annual change of C in wood and paper products in use in the United States and other countries where the wood came from trees harvested in the United States,
- (2B) annual change of C in wood and paper products in SWDS in the United States and other countries where the wood came from trees harvested in the United States,

- (3) C in imports of wood, pulp, and paper to the United States,
- (4) C in exports of wood, pulp and paper from the United States, and
- (5) C in annual harvest of wood from forests in the United States.

The sum of variables 2A and 2B yielded the estimate for HWP contribution under the production estimation approach. A key assumption for estimating these variables that adds uncertainty in the estimates was that products exported from the United States and held in pools in other countries have the same half-lives for products in use, the same percentage of discarded products going to SWDS, and the same decay rates in SWDS as they would in the United States.

Uncertainty

A quantitative uncertainty analysis placed bounds on the flux estimates for forest ecosystems through a combination of sample-based and model-based approaches to uncertainty estimation for forest ecosystem CO_2 flux using IPCC Approach 1 (Table 6-12 and Table A-196 for state-level uncertainties). A Monte Carlo Stochastic Simulation of the methods described above, and probabilistic sampling of C conversion factors, were used to determine the HWP uncertainty using IPCC Approach 2. See Annex 3.13 for additional information. The 2021 net annual change for forest C stocks was estimated to be between -773.6 and -618.1 MMT CO_2 Eq. around a central estimate of -695.4 MMT CO_2 Eq. at a 95 percent confidence level. This includes a range of -665.6 to -519.5 MMT CO_2 Eq. around a central estimate of -592.5 MMT CO_2 Eq. for forest ecosystems and -130.9 to -77.8 MMT CO_2 Eq. around a central estimate of -102.8 MMT CO_2 Eq. for HWP.

Table 6-12: Quantitative Uncertainty Estimates for Net CO₂ Flux from Forest Land Remaining Forest Land: Changes in Forest C Stocks (MMT CO₂ Eq. and Percent)

Source	Con	2021 Flux Estimate	Unce	rtainty Range Re	ty Range Relative to Flux Estimate			
Jource	Gas	(MMT CO ₂ Eq.)	(MM	T CO₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Forest Ecosystem C Pools ^a	CO ₂	(592.5)	(665.6)	(519.5)	-12.3%	12.3%		
Harvested Wood Products ^b	CO_2	(102.8)	(130.9)	(77.8)	-27.3%	24.3%		
Total Forest	CO ₂	(695.4)	(773.6)	(618.1)	-11.3%	11.1%		

^a Range of flux estimates predicted through a combination of sample-based and model-based uncertainty for a 95 percent confidence interval, IPCC Approach 1.

Notes: Parentheses indicate negative values or net uptake. Totals may not sum due to independent rounding.

QA/QC and Verification

The FIA program has conducted consistent forest surveys based on extensive statistically-based sampling of most of the forest land in the conterminous U.S., dating back to 1952. The FIA program includes numerous quality assurance and quality control (QA/QC) procedures, including calibration among field crews, duplicate surveys of some plots, and systematic checking of recorded data. Because of the statistically-based sampling, the large number of survey plots, and the quality of the data, the survey databases developed by the FIA program form a strong foundation for C stock estimates. Field sampling protocols, summary data, and detailed inventory databases are archived and are publicly available (USDA Forest Service 2022d).

General quality control procedures were used in performing calculations to estimate C stocks based on survey data. For example, the C datasets, which include inventory variables such as areas and volumes, were compared to standard inventory summaries such as the forest resource statistics of Oswalt et al. (2019) or selected population estimates generated from the FIA database, which are available at an FIA internet site (USDA Forest Service

^b Range of flux estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval, IPCC Approach 2.

2022b). Agreement between the C datasets and the original inventories is important to verify accuracy of the data used.

Estimates of the HWP variables and the HWP contribution under the production estimation approach use data from U.S. Census and USDA Forest Service surveys of production and trade and other sources (Hair and Ulrich 1963; Hair 1958; USDC Bureau of Census 1976; Ulrich 1985, 1989; Steer 1948; AF&PA 2006a, 2006b; Howard 2003, 2007; Howard and Jones 2016; Howard and Liang 2019; AF&PA 2021; FAO 2021). Factors to convert wood and paper to units of C are based on estimates by industry and U.S. Forest Service published sources (see Annex 3.13). The WOODCARB II model uses estimation methods suggested by IPCC (2006). Estimates of annual C change in solidwood and paper products in use were calibrated to meet two independent criteria. The first criterion is that the WOODCARB II model estimate of C in houses standing in 2001 needs to match an independent estimate of C in housing based on U.S. Census and USDA Forest Service survey data. Meeting the first criterion resulted in an estimated half-life of about 80 years for single family housing built in the 1920s, which is confirmed by other U.S. Census data on housing. The second criterion is that the WOODCARB II model estimate of wood and paper being discarded to SWDS needs to match EPA estimates of discards used in the Waste sector each year over the period 1990 to 2000 (EPA 2006). These criteria help reduce uncertainty in estimates of annual change in C in products in use in the United States and, to a lesser degree, reduce uncertainty in estimates of annual change in C in products made from wood harvested in the United States. In addition, WOODCARB II landfill decay rates have been validated by ensuring that estimates of CH₄ emissions from landfills based on EPA (2006) data are reasonable in comparison to CH₄ estimates based on WOODCARB II landfill decay rates.

Recalculations Discussion

The methods used in the current Inventory to compile estimates for forest ecosystem carbon stocks and stock changes and HWPs from 1990 through 2021 are consistent with those used in the previous (1990 through 2020) Inventory. Population estimates of carbon stocks and stock changes were compiled using NFI data from each U.S. state and national estimates were compiled by summing over all states. New NFI data in most states were incorporated in the latest Inventory which contributed to decreases in forest land area estimates and carbon stocks, particularly in Alaska where new data from 2018 to 2021, particularly litter and soil data, were included (Table 6-13). Fire data sources were also updated for Alaska through 2021 and this combined with the new NFI data for the years 2018 through 2021 resulted in substantial changes in carbon stocks and stock changes. Soil (organic) carbon stocks decreased in the latest Inventory relative to the previous Inventory and mineral soil carbon stocks increased slightly in this Inventory relative to the previous Inventory. These changes can be attributed to obtaining plot-level soil orders using the more refined gridded National Soil Survey Geographic Database (gNATSGO) dataset (Soil Survey Staff 2020a, 2020b), rather than the Digital General Soil Map of the United States (STATSGO2) dataset which had been used in previous Inventories (Table 6-13). This resulted in a structural change in the soil carbon estimates for mineral and organic soils across the entire time series, particularly in Alaska where new data on forest area was included for the years 2018 through 2021 (Table 6-8). Finally, recent land-use change in Alaska (since 2015) also contributed to variability in soil carbon stocks and stock changes in recent years in the time series, which led to differences in estimates in the previous Inventory and the current Inventory. New data included in the HWP time-series result in a minor decrease (< 1 percent) in carbon stocks in the HWP pools but a substantial increase (60 percent) in the carbon stock change estimates for Products in Use and to a lesser extent (2 percent) in SWDS between the previous Inventory and the current Inventory. With the easing of the global pandemic and the return of consumers to the marketplace, there was a rebound in the purchase and accumulation of both paper and solid wood products. This rebound is expected to continue in 2022.

Table 6-13: Recalculations of Forest Area (1,000 ha) and C Stocks in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

	2021 Estimate,	2021 Estimate,	2022 Estimate,
	Previous Inventory	Current Inventory	Current Inventory
Forest Area (1000 ha)	281,951	279,962	279,800

Carbon Pools (MMT C)			
Forest	58,316	56,790	56,951
Aboveground Biomass	15,688	15,749	15,861
Belowground Biomass	3,106	3,121	3,143
Dead Wood	2,896	2,799	2,827
Litter	3,810	3,888	3,888
Soil (Mineral)	25,459	25,915	25,916
Soil (Organic)	7,357	5,317	5,317
Harvested Wood	2,718	2,721	2,749
Products in Use	1,536	1,539	1,549
SWDS	1,182	1,182	1,200
Total Stock	61,034	59,511	59,701

Note: Totals may not sum due to independent rounding.

Table 6-14: Recalculations of Net C Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

Carbon Pool (MMT C)	2020 Estimate, Previous Inventory	2020 Estimate, Current Inventory	2021 Estimate, Current Inventory
Forest	(159.4)	(166.6)	(161.6)
Aboveground Biomass	(108.7)	(114.3)	(111.6)
Belowground Biomass	(21.6)	(22.7)	(22.1)
Dead Wood	(27.7)	(27.9)	(27.6)
Litter	(0.5)	(0.5)	0.5
Soil (Mineral)	(1.1)	(1.5)	(1.1)
Soil (Organic)	0.1	0.0	0.0
Drained organic soil	0.2	0.2	0.2
Harvested Wood	(22.8)	(26.3)	(28.0)
Products in Use	(5.5)	(8.7)	(10.3)
SWDS	(17.3)	(17.6)	(17.7)
Total Net Flux	(182.2)	(192.9)	(189.6)

Note: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Planned Improvements

Reliable estimates of forest C stocks and changes across the diverse ecosystems of the United States require a high level of investment in both annual monitoring and associated analytical techniques. Development of improved monitoring/reporting techniques is a continuous process that occurs simultaneously with annual Inventory submissions. Planned improvements can be broadly assigned to the following categories: development of a robust estimation and reporting system, individual C pool estimation, coordination with other land-use categories, and annual inventory data incorporation.

While this Inventory submission includes C change by Forest Land Remaining Forest Land and Land Converted to Forest Land and C stock changes for all IPCC pools in these two categories, there are many improvements that are still necessary. The estimation approach used for the conterminous United States in the current Inventory for the forest land category operates at the state scale, whereas previously the western United States and southeast and southcentral coastal Alaska operated at a regional scale. While this is an improvement over previous Inventories and led to improved estimation and separation of land-use categories in the current Inventory, research is underway to leverage all FIA data and auxiliary information (i.e., remotely sensed information) to operate at finer spatial and temporal scales. As in past submissions, emissions and removals associated with natural (e.g., wildfire, insects, and disease) and human (e.g., harvesting) disturbances are implicitly included in the report given the design of the annual NFI, but not explicitly estimated. In addition to integrating auxiliary information into the estimation framework and leveraging all NFI plot measurements, alternative estimators are also being evaluated which will eliminate latency in population estimates from the NFI, improve annual estimation and characterization

of interannual variability, facilitate attribution of fluxes to particular activities, and allow for streamlined harmonization of NFI data with auxiliary data products. This will also facilitate separation of prescribed and wildfire emissions in future reports. The transparency and repeatability of estimation and reporting systems will be improved through the dissemination of open-source code (e.g., R programming language) in concert with the public availability of the annual NFI (USDA Forest Service 2022b). Also, several FIA database processes are being institutionalized to increase efficiency and QA/QC in reporting and further improve transparency, completeness, consistency, accuracy, and availability of data used in reporting. Finally, a combination of approaches was used to estimate uncertainty associated with C stock changes in the Forest Land Remaining Forest Land category in this report. There is research underway investigating more robust approaches to estimate total uncertainty (Clough et al. 2016), which will be considered in future Inventory reports.

The modeling framework used to estimate downed dead wood within the dead wood C pool (Smith et al. 2022) will be updated similar to the litter (Domke et al. 2016) and soil C pools (Domke et al. 2017). Finally, components of other pools, such as C in belowground biomass (Russell et al. 2015) and understory vegetation (Russell et al. 2014; Johnson et al. 2017), are being explored but may require additional investment in field inventories before improvements can be realized in the Inventory report.

The foundation of forest C estimation and reporting is the annual NFI. The ongoing annual surveys by the FIA program are expected to improve the accuracy and precision of forest C estimates as new state surveys become available (USDA Forest Service 2022b). With the exception of Wyoming (which will have sufficient remeasurements in the years ahead), all other states in the conterminous United States now have sufficient annual NFI data to consistently estimate C stocks and stock changes for the future using the state-level compilation system. The FIA program continues to install permanent plots in Alaska as part of the operational NFI, and as more plots are added to the NFI, they will be used to improve estimates for all managed forest land in Alaska. The methods used to include all managed forest land in the conterminous United States will be used in future Inventories for Hawaii and U.S. Territories as forest C data become available (only a small number of plots from Hawaii are currently available from the annualized sampling design). To that end, research is underway to incorporate all NFI information (both annual and periodic data) and the dense time series of remotely sensed data in multiple inferential frameworks for estimating greenhouse gas emissions and removals as well as change (i.e., disturbance or land-use changes) detection and attribution across the entire reporting period and all managed forest land in the United States. Leveraging this auxiliary information will aid the efforts to improve estimates for interior Alaska as well as the entire inventory system. In addition to fully inventorying all managed forest land in the United States, the more intensive sampling (i.e., more samples) of fine woody debris, litter, and SOC on a subset of FIA plots continues and will substantially improve spatial and temporal resolution of C pools (Westfall et al. 2013) as this information becomes available (Woodall et al. 2011b). Increased sample intensity of some C pools and using annualized sampling data as it becomes available for those states currently not reporting are planned for future submissions. There will also be improved methods and models to characterize standing live and dead tree carbon in the next Inventory. The NFI sampling frame extends beyond the forest land-use category (e.g., woodlands, which fall into the grasslands land-use category, and urban areas, which fall into the settlements land-use category) with inventory-relevant information for trees outside of forest land. These data will be utilized as they become available in the NFI.

Non-CO₂ Emissions from Forest Fires

Emissions of non-CO₂ gases from forest fires were estimated using U.S.-specific data and models for annual area of forest burned, fuel, consumption, and emission consistent with IPCC (2006). In 2021, emissions from this source were estimated to be 15.5 MMT CO₂ Eq. of CH₄ and 8.9 MMT CO₂ Eq. of N₂O (Table 6-15; kt units provided in Table 6-16). The estimates of non-CO₂ emissions from forest fires include the conterminous 48 states plus managed forest land in Alaska (Ogle et al. 2018).

Table 6-15: Non-CO₂ Emissions from Forest Fires (MMT CO₂ Eq.)^a

Gas	1990	2005	2017	2018	2019	2020	2021
CH ₄	3.2	10.9	9.6	6.9	6.4	15.0	15.5
N_2O	2.3	7.4	5.4	4.2	4.4	8.0	8.9
Total	5.5	18.3	15.0	11.0	10.8	23.0	24.4

^a These estimates include Non-CO₂ emissions from forest fires on Forest Land Remaining Forest Land and Land Converted to Forest Land.

Note: Totals may not sum due to independent rounding

Table 6-16: Non-CO₂ Emissions from Forest Fires (kt)^a

	1000	2005	2017	2018	2019	2020	2021
Gas	1990	2005	2017	2018	2019	2020	2021
CH ₄	116	39.	342	245	228	534	554
N_2O	9	28	21	16	17	30	34
CO	2,985	10,039	7,298	5,347	5,885	11,080	11,798
NO_x	48	145	122	100	89	171	201

^a These estimates include Non-CO₂ emissions from forest fires on Forest Land Remaining Forest Land and Land Converted to Forest Land.

Methodology and Time-Series Consistency

Non-CO₂ emissions from forest fires—primarily CH₄ and N₂O emissions—were calculated consistent with IPCC (2006) methodology, which included U.S.-specific data and models on area burned, fuel, consumption, and emission. The annual estimates were calculated by the Wildland Fire Emissions Inventory System (WFEIS, French et al. 2011, 2014) with area burned based on Monitoring Trends in Burn Severity (MTBS, Eidenshink et al. 2007) or MODIS burned area mapping (MODIS MCD64A1, Giglio et al. 2018) data. The MTBS data available for this report (MTBS 2022) included fires through 2020, and the MODIS-based records include 2001 through 2021. Emissions reported here are calculated from MTBS data for the 1990 to 2020 interval, and the 2001 through 2021 emissions are also based on MODIS burned areas. Where both the MTBS and MODIS sources are available, the predictions are averaged. Note that N₂O emissions are not included in WFEIS calculations; the emissions provided here are based on the average N₂O to CO₂ ratio of 0.000166 following Larkin et al. (2014). See Emissions from Forest Fires in Annex 3.13 for further details on all fire-related emissions calculations for forests. Consistent use of available data sources, data processing, and calculation methods were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Uncertainty estimates for non-CO₂ emissions from forest fires are based on a Monte Carlo (IPCC Approach 2) approach to propagate variability among the alternate WFEIS annual estimates per state. Uncertainty in parts of the WFEIS system are not currently quantified. Among potential sources for future analysis are burned areas from MTBS or MODIS, the fuels models or the Consume model (Prichard et al. 2014). See Annex 3.13 for the quantities and assumptions employed to define and propagate uncertainty. The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 6-17.

Table 6-17: Quantitative Uncertainty Estimates of Non-CO₂ Emissions from Forest Fires (MMT CO₂ Eq. and Percent)^a

Sauraa	Coo	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimateb					
Source	Gas	(MMT CO ₂ Eq.)	(MMT C	O₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Non-CO ₂ Emissions from	CH ₄	15.5	10.5	20.5	-32%	32%		

Forest Fires						
Non-CO ₂ Emissions from Forest Fires	N_2O	8.9	2.6	15.3	-71%	72%

^a These estimates include Non-CO₂ emissions from forest fires on Forest Land Remaining Forest Land and Land Converted to Forest Land.

QA/QC and Verification

Tier 1 and Tier 2 QA/QC activities were conducted consistent with the U.S. QA/QC plan. Source-specific quality control measures for estimating non- CO_2 emissions from forest fires included checking input data, documentation, and calculations to ensure data were properly handled through the inventory process and results were consistent with values expected from those calculations. The QA/QC procedures did not reveal any inaccuracies or incorrect input values.

Recalculations Discussion

The methods used in the current (1990 through 2021) Inventory to compile estimates of non-CO₂ emissions from forest fires represent a slight change relative to the previous (1990 through 2020) Inventory. The basic components of calculating forest fire emissions (IPCC 2006) remain unchanged, but the WFEIS-based estimates now include both MTBS and MODIS based burns and two alternate fuel models where available. An additional source of change leading to recalculations are recent and ongoing updates to the MTBS fire records (i.e., including both most-recent as well as possible updates to past years' fires).

The EPA also updated global warming potentials (GWP) for calculating CO_2 -equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWP values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series.

The net result of implementing AR5 GWP values and other improvements listed above was an average annual increase of 0.2 MMT CO₂ Eq., or 1 percent, in total non-CO₂ emissions from forest fires across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Continuing improvements are planned for developing better fire and site-specific estimates for forest fires. The focus will be on addressing three aspects of reporting: best use of WFEIS, better resolution of uncertainty as discussed above, and identification of burned areas that are not captured by MTBS records.

N₂O Emissions from N Additions to Forest Soils

Of the synthetic nitrogen (N) fertilizers applied to soils in the United States, no more than one percent is applied to forest soils. Application rates are similar to those occurring on cropland soils, but in any given year, only a small proportion of total forested land receives N fertilizer. This is because forests are typically fertilized only twice during their approximately 40-year growth cycle (once at planting and once midway through their life cycle). While the rate of N fertilizer application for the area of forests that receives N fertilizer in any given year is relatively high, the annual application rate is quite low over the entire area of forest land.

N additions to soils result in direct and indirect N_2O emissions. Direct emissions occur on-site due to the N additions. Indirect emissions result from fertilizer N that is transformed and transported to another location through volatilization in the form of ammonia [NH₃] and nitrogen oxide [NO_x], in addition to leaching and runoff of nitrates [NO₃], and later converted into N_2O at off-site locations from the original N application. The indirect

^b Range of flux estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

emissions are assigned to forest land because the management activity leading to the emissions occurred in forest land.

Direct soil N_2O emissions from Forest Land Remaining Forest Land and Land Converted to Forest Land³³ in 2021 were 0.3 MMT CO_2 Eq. (1.2 kt), and the indirect emissions were 0.1 MMT CO_2 Eq. (0.4 kt). Total emissions for 2021 were 0.4 MMT CO_2 Eq. (1.5 kt) and have increased by 455 percent from 1990 to 2021. Total forest soil N_2O emissions are summarized in Table 6-18.

Table 6-18: N₂O Fluxes from Soils in Forest Land Remaining Forest Land and Land Converted to Forest Land (MMT CO₂ Eq. and kt N₂O)

	1990	2005	2017	2018	2019	2020	2021
Direct N₂O Fluxes from Soils							
MMT CO ₂ Eq.	0.1	0.3	0.3	0.3	0.3	0.3	0.3
kt N ₂ O	0.2	1.2	1.2	1.2	1.2	1.2	1.2
Indirect N ₂ O Fluxes from Soils							
MMT CO ₂ Eq.	+	0.1	0.1	0.1	0.1	0.1	0.1
kt N₂O	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Total							
MMT CO ₂ Eq.	0.1	0.4	0.4	0.4	0.4	0.4	0.4
kt N₂O	0.3	1.5	1.5	1.5	1.5	1.5	1.5

⁺ Does not exceed 0.05 MMT CO₂ Eq. or 0.05 kt.

Notes: Totals may not sum due to independent rounding. The N_2O emissions from Land Converted to Forest Land are included with Forest Land Remaining Forest Land because it is not currently possible to separate the activity data by land-use conversion category.

Methodology and Time-Series Consistency

The IPCC Tier 1 approach is used to estimate N₂O from soils within Forest Land Remaining Forest Land and Land Converted to Forest Land. According to U.S. Forest Service statistics for 1996 (USDA Forest Service 2001), approximately 75 percent of trees planted are for timber, and about 60 percent of national total harvested forest area is in the southeastern United States. Although southeastern pine plantations represent the majority of fertilized forests in the United States, this Inventory also incorporated N fertilizer application to commercial Douglas-fir stands in western Oregon and Washington. For the Southeast, estimates of direct N₂O emissions from fertilizer applications to forests are based on the area of pine plantations receiving fertilizer in the southeastern United States and estimated application rates (Albaugh et al. 2007; Fox et al. 2007). Fertilizer application is rare for hardwoods and therefore not included in the inventory (Binkley et al. 1995). For each year, the area of pine receiving N fertilizer is multiplied by the weighted average of the reported range of N fertilization rates (121 lbs. N per acre). Area data for pine plantations receiving fertilizer in the Southeast are not available for 2005 through 2021, so data from 2004 are used for these years. For commercial forests in Oregon and Washington, only fertilizer applied to Douglas-fir is addressed in the inventory because the vast majority (approximately 95 percent) of the total fertilizer applied to forests in this region is applied to Douglas-fir (Briggs 2007). Estimates of total Douglas-fir area and the portion of fertilized area are multiplied to obtain annual area estimates of fertilized Douglas-fir stands. Similar to the Southeast, data are not available for 2005 through 2021, so data from 2004 are used for these years. The annual area estimates are multiplied by the typical rate used in this region (200 lbs. N per acre) to estimate total N applied (Briggs 2007), and the total N applied to forests is multiplied by the IPCC (2006) default emission factor of one percent to estimate direct N₂O emissions.

For indirect emissions, the volatilization and leaching/runoff N fractions for forest land are calculated using the IPCC default factors of 10 percent and 30 percent, respectively. The amount of N volatilized is multiplied by the

 $^{^{33}}$ The N_2O emissions from Land Converted to Forest Land are included with Forest Land Remaining Forest Land because it is not currently possible to separate the activity data by land-use conversion category.

IPCC default factor of one percent for the portion of volatilized N that is converted to N₂O off-site. The amount of N leached/runoff is multiplied by the IPCC default factor of 0.075 percent for the portion of leached/runoff N that is converted to N_2O off-site. The resulting estimates are summed to obtain total indirect emissions.

The same method is applied in all years of this Inventory to ensure time-series consistency from 1990 through 2021.

Uncertainty

The amount of N₂O emitted from forests depends not only on N inputs and fertilized area, but also on a large number of variables, including organic C availability, oxygen gas partial pressure, soil moisture content, pH, temperature, and tree planting/harvesting cycles. The effect of the combined interaction of these variables on N2O flux is complex and highly uncertain. IPCC (2006) does not incorporate any of these variables into the default methodology, except variation in estimated fertilizer application rates and estimated areas of forested land receiving N fertilizer. All forest soils are treated equivalently under this methodology. Furthermore, only applications of synthetic N fertilizers to forest are captured in this Inventory, so applications of organic N fertilizers are not estimated. However, the total quantity of organic N inputs to soils in the United States is included in the inventory for Agricultural Soil Management (Section 5.4) and Settlements Remaining Settlements (Section 6.10).

Uncertainties exist in the fertilization rates, annual area of forest lands receiving fertilizer, and the emission factors. Fertilization rates are assigned a default level³⁴ of uncertainty at ±50 percent, and area receiving fertilizer is assigned a ±20 percent according to expert knowledge (Binkley 2004). The uncertainty ranges around the 2004 activity data and emission factor input variables are directly applied to the 2021 emission estimates. IPCC (2006) provided estimates for the uncertainty associated with direct and indirect N2O emission factor for synthetic N fertilizer application to soils.

Uncertainty is quantified using simple error propagation methods (IPCC 2006). The results of the quantitative uncertainty analysis are summarized in Table 6-19. Direct N₂O fluxes from soils in 2021 are estimated to be between 0.1 and 1.0 MMT CO₂ Eq. at a 95 percent confidence level. This indicates a range of 59 percent below and 211 percent above the emission estimate of 0.3 MMT CO₂ Eq. for 2021. Indirect N₂O emissions in 2021 are 0.1 MMT CO₂ Eq. and have a range are between 0.01 and 0.3 MMT CO₂ Eq., which is 86 percent below to 238 percent above the emission estimate for 2021.

Table 6-19: Quantitative Uncertainty Estimates of N₂O Fluxes from Soils in Forest Land Remaining Forest Land and Land Converted to Forest Land (MMT CO₂ Eq. and Percent)

Saurea	2021 Emission Estimate		Uncertainty Range Relative to Emission Estimat						
Source	Gas	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)				
Forest Land Remaining Forest			Lower	Upper	Lower	Upper			
Land			Bound	Bound	Bound	Bound			
Direct N ₂ O Fluxes from Soils	N ₂ O	0.3	0.1	1.0	-59%	+211%			
Indirect N ₂ O Fluxes from Soils	N_2O	0.1	+	0.3	-86%	+238%			

⁺ Does not exceed 0.05 MMT CO₂ Eq.

QA/QC and Verification

The spreadsheet containing fertilizer applied to forests and calculations for N₂O and uncertainty ranges are checked and verified based on the sources of these data.

 $^{^{34}}$ Uncertainty is unknown for the fertilization rates so a conservative value of ±50 percent is used in the analysis.

Recalculations Discussion

EPA updated global warming potential (GWP) for calculating CO₂-equivalent emissions of N₂O (from 298 to 265) to reflect the 100-year GWP values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWP values provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series.

As a result of this change, calculated CO_2 -equivalent emissions decreased by an annual average of 0.04 MMT CO_2 Eq., or 11 percent, over the time series from 1990 to 2020 compared to the previous Inventory.

Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

CO₂, CH₄, and N₂O Emissions from Drained Organic Soils³⁵

Drained organic soils on forest land are identified separately from other forest soils largely because mineralization of the exposed or partially dried organic material results in continuous CO_2 and N_2O emissions (IPCC 2006). In addition, the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands (IPCC 2014) calls for estimating CH_4 emissions from these drained organic soils and the ditch networks used to drain them.

Organic soils are identified on the basis of thickness of organic horizon and percent organic matter content. All organic soils are assumed to have originally been wet, and drained organic soils are further characterized by drainage or the process of artificially lowering the soil water table, which exposes the organic material to drying and the associated emissions described in this section. The land base considered here is drained inland organic soils that are coincident with forest area as identified by the NFI of the USDA Forest Service (USDA Forest Service 2022b).

The estimated area of drained organic soils on forest land is 70,849 ha and did not change over the time series based on the data used to compile the estimates in the current Inventory. These estimates are based on permanent plot locations of the NFI (USDA Forest Service 2022b) coincident with mapped organic soil locations (STATSGO2 2016), which identifies forest land on organic soils. Forest sites that are drained are not explicitly identified in the data, but for this estimate, planted forest stands on sites identified as mesic or xeric (which are identified in USDA Forest Service 2022c, d) are labeled "drained organic soil" sites.

Land use, region, and climate are broad determinants of emissions as are more site-specific factors such as nutrient status, drainage level, exposure, or disturbance. Current data are limited in spatial precision and thus lack site specific details. At the same time, corresponding emissions factor data specific to U.S. forests are similarly lacking. Tier 1 estimates are provided here following IPCC (2014). Total annual non-CO₂ emissions on forest land with drained organic soils in 2021 are estimated as 0.8 MMT CO₂ Eq. per year (Table 6-20; kt units provided in 6-21).

The Tier 1 methodology provides methods to estimate emissions of CO₂ from three pathways: direct emissions primarily from mineralization; indirect, or off-site, emissions associated with dissolved organic carbon releasing CO₂ from drainage waters; and emissions from (peat) fires on organic soils. Data about forest fires specifically located on drained organic soils are not currently available; as a result, no corresponding estimate is provided here. Non-CO₂ emissions provided here include CH₄ and N₂O. Methane emissions generally associated with anoxic conditions do occur from the drained land surface, but the majority of these emissions originate from ditches

 35 Estimates of CO₂ emissions from drained organic soils are described in this section but reported in Table 6-8 and Table 6-9 for both Forest Land Remaining Forest Land and Land Converted to Forest Land in order to allow for reporting of all C stock changes on forest lands in a complete and comprehensive manner.

constructed to facilitate drainage at these sites. Emission of N_2O can be significant from these drained organic soils in contrast to the very low emissions from wet organic soils.

Table 6-20: Non-CO₂ Emissions from Drained Organic Forest Soils^{a,b} (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
CH ₄	+	+	+	+	+	+	+
N_2O	0.1	0.1	0.1	0.1	0. 1	0.1	0.1
Total	0.1	0.1	0.1	0.1	0.1	0.1	0.1

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 6-21: Non-CO₂ Emissions from Drained Organic Forest Soils^{a,b} (kt)

Source	1990	2005	2017	2018	2019	2020	2021
CH ₄	1	1	1	1	1	1	1
N_2O	+	+	+	+	+	+	+

⁺ Does not exceed 0.5 kt.

Methodology and Time-Series Consistency

The Tier 1 methods for estimating CO_2 , CH_4 and N_2O emissions from drained inland organic soils on forest lands follow IPCC (2006), with extensive updates and additional material presented in the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands (IPCC 2014). With the exception of quantifying area of forest on drained organic soils, which is user-supplied, all quantities necessary for Tier 1 estimates are provided in Chapter 2, Drained Inland Organic Soils of IPCC (2014).

Estimated area of drained organic soils on forest land is 70,849 ha based on analysis of the permanent NFI of the USDA Forest Service and did not change over the time series. The most recent plot data per state within the inventories were used in a spatial overlay with the STATSGO2 (2016) soils data, and forest plots coincident with the soil order histosol were selected as having organic soils. Information specific to identifying "drained organic" are not in the inventory data so an indirect approach was employed here. Specifically, artificially regenerated forest stands (inventory field STDORGCD=1) on mesic or xeric sites (inventory field 11≤PHYSCLCD≤29) are labeled "drained organic soil" sites. From this selection, forest area and sampling error for forest on drained organic sites are based on the population estimates developed within the inventory data for each state (USDA Forest Service 2022d). Eight states, all temperate forests (including pine forest in northern Florida, which largely display characteristics of temperate forests), were identified as having drained organic soils (Table 6-22).

^a This table includes estimates from Forest Land Remaining Forest Land and Land Converted to Forest Land.

^b Estimates of CO₂ emissions from drained organic soils are described in this section but reported in Table 6-8 and Table 6-9 for both Forest Land Remaining Forest Land and Land Converted to Forest Land in order to allow for reporting of all C stock changes on forest lands in a complete and comprehensive manner.

^a This table includes estimates from Forest Land Remaining Forest Land and Land Converted to Forest Land.

^b Estimates of CO₂ emissions from drained organic soils are described in this section but reported in Table 6-8 and Table 6-9 for both Forest Land Remaining Forest Land and Land Converted to Forest Land in order to allow for reporting of all C stock changes on forest lands in a complete and comprehensive manner.

Table 6-22: States identified as having Drained Organic Soils, Area of Forest on Drained Organic Soils, and Sampling Error

	Forest on Drained Organic Soil	Sampling Error (68.3% as ±
State	(1,000 ha)	Percentage of Estimate)
Florida	2.4	79
Georgia	3.7	71
Michigan	18.7	34
Minnesota	30.2	19
North Carolina	1.3	99
Virginia	2.3	102
Washington	2.1	101
Wisconsin	10.1	30
Total	70.8	14

Note: Totals may not sum due to independent rounding.

The Tier 1 methodology provides methods to estimate emissions for three pathways of C emission as CO₂. Note that subsequent mention of equations and tables in the remainder of this section refer to Chapter 2 of IPCC (2014). The first pathway—direct CO₂ emissions—is calculated according to Equation 2.3 and Table 2.1 as the product of forest area and emission factor for temperate drained forest land. The second pathway—indirect, or off-site, emissions—is associated with dissolved organic carbon (DOC) releasing CO₂ from drainage waters according to Equation 2.4 and Table 2.2, which represent a default composite of the three pathways for this flux: (1) the flux of DOC from natural (undrained) organic soil; (2) the proportional increase in DOC flux from drained organic soils relative to undrained sites; and (3) the conversion factor for the part of DOC converted to CO₂ after export from a site. The third pathway—emissions from (peat) fires on organic soils—assumes that the drained organic soils burn in a fire, but not any wet organic soils. However, this Inventory currently does not include emissions for this pathway because data on the combined fire and drained organic soils information are not available at this time; this may become available in the future with additional analysis.

Non-CO₂ emissions, according to the Tier 1 method, include methane (CH₄), nitrous oxide (N₂O), and carbon monoxide (CO). Emissions associated with peat fires include factors for CH₄ and CO in addition to CO₂, but fire estimates are assumed to be zero for the current Inventory, as discussed above. Methane emissions generally associated with anoxic conditions do occur from the drained land surface, but the majority of these emissions originate from ditches constructed to facilitate drainage at these sites. From this, two separate emission factors are used, one for emissions from the area of drained soils and a second for emissions from drainage ditch waterways. Calculations are conducted according to Equation 2.6 and Tables 2.3 and 2.4, which includes the default fraction of the total area of drained organic soil which is occupied by ditches. Emissions of N₂O can be significant from these drained soils in contrast to the very low emissions from wet organic soils. Calculations are conducted according to Equation 2.7 and Table 2.5, which provide the estimate as kg N per year.

Methodological calculations were applied to the entire set of estimates for 1990 through 2021. Year-specific data are not available. Estimates are based on a single year and applied as the annual estimates over the interval.

Uncertainty

Uncertainties are based on the sampling error associated with forest area of drained organic soils and the uncertainties provided in the Chapter 2 (IPCC 2014) emissions factors (Table 6-23). The estimates and resulting quantities representing uncertainty are based on the IPCC Approach 1—error propagation. However, probabilistic sampling of the distributions defined for each emission factor produced a histogram result that contained a mean and 95 percent confidence interval. The primary reason for this approach was to develop a numerical representation of uncertainty with the potential for combining with other forest components. The methods and parameters applied here are identical to previous inventories, but input values were resampled for this Inventory, which results in minor changes in the number of significant digits in the resulting estimates, relative to past values. The total non-CO₂ emissions in 2021 from drained organic soils on Forest Land Remaining Forest Land and Land

Converted to Forest Land were estimated to be between 0 and $0.150 \text{ MMT CO}_2 \text{ Eq.}$ around a central estimate of $0.068 \text{ MMT CO}_2 \text{ Eq.}$ at a 95 percent confidence level.

Table 6-23: Quantitative Uncertainty Estimates for Non-CO₂ Emissions on Drained Organic Forest Soils (MMT CO₂ Eq. and Percent)^a

Source	2021 Emission Estimate	Uncertaint	y Range Relati	ve to Emission	n Estimate	
(MMT CO₂ Eq	(MMT CO ₂ Eq.)	(MN	IT CO₂ Eq.)	(%)		
		Lower	Upper	Lower	Upper	
		Bound	Bound	Bound	Bound	
CH ₄	+	+	+	-69%	+82%	
N_2O	0.1	+	0.1	-118%	+132%	
Total	0.1	+	0.2	-107%	+120%	

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

QA/QC and Verification

IPCC (2014) guidance cautions of a possibility of double counting some of these emissions. Specifically, the off-site emissions of dissolved organic C from drainage waters may be double counted if soil C stock and change is based on sampling and this C is captured in that sampling. Double counting in this case is unlikely since plots identified as drained were treated separately in this chapter. Additionally, some of the non-CO₂ emissions may be included in either the Wetlands or sections on N₂O emissions from managed soils. These paths to double counting emissions are unlikely here because these issues are taken into consideration when developing the estimates and this chapter is the only section directly including such emissions on forest land.

Recalculations Discussion

The EPA updated global warming potentials (GWP) for calculating CO_2 -equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC Fourth Assessment Report (AR4). This update was applied across the entire time series. As a result of this change, there was a minimal decrease in average annual calculated CO_2 -equivalent total emissions from drained organic forest soils from 1990 through 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Additional data will be compiled to update estimates of forest areas on drained organic soils as new reports and geospatial products become available.

^a Range of flux estimates predicted through a combination of sample-based and IPCC defaults for a 95 percent confidence interval, IPCC Approach 1.

6.3 Land Converted to Forest Land (CRF Source Category 4A2)

The C stock change estimates for Land Converted to Forest Land that are provided in this Inventory include all forest land in an inventory year that had been in another land use(s) during the previous 20 years. ³⁶ For example, cropland or grassland converted to forest land during the past 20 years would be reported in this category. Converted lands are in this category for 20 years as recommended in the *2006 IPCC Guidelines* (IPCC 2006), after which they are classified as Forest Land Remaining Forest Land. Estimates of C stock changes from all pools (i.e., aboveground and belowground biomass, dead wood, litter and soils), as recommended by IPCC (2006), are included in the Land Converted to Forest Land category of this Inventory.

Area of Land Converted to Forest in the United States³⁷

Land conversion to and from forests has occurred regularly throughout U.S. history. The 1970s and 1980s saw a resurgence of federally sponsored forest management programs (e.g., the Forestry Incentive Program) and soil conservation programs (e.g., the Conservation Reserve Program), which have focused on tree planting, improving timber management activities, combating soil erosion, and converting marginal cropland to forests. Recent analyses suggest that net accumulation of forest area continues in areas of the United States, in particular the northeastern United States (Woodall et al. 2015b). Specifically, the annual conversion of land from other land-use categories (i.e., Cropland, Grassland, Wetlands, Settlements, and Other Lands) to Forest Land resulted in a fairly continuous net annual accretion of Forest Land area from over the time series at an average rate of 1.0 million ha year⁻¹.

Over the 20-year conversion period used in the Land Converted to Forest Land category, the conversion of cropland to forest land resulted in the largest source of C transfer and uptake, accounting for approximately 39 percent of the uptake annually. Estimated C uptake has remained relatively stable over the time series across all conversion categories (see Table 6-24). The net flux of C from all forest pool stock changes in 2021 was -98.3 MMT CO₂ Eq. (-26.8 MMT C) (Table 6-24 and Table 6-25).

Mineral soil C stocks increased slightly over the time series for Land Converted to Forest Land. The small gains are associated with Cropland Converted to Forest Land, Settlements Converted to Forest Land, and Other Land Converted to Forest Land. Much of this conversion is from soils that are more intensively used under annual crop production or settlement management, or are conversions from other land, which has little to no soil C. In contrast, Grassland Converted to Forest Land leads to a loss of soil C across the time series, which negates some of the gain in soil C with the other land-use conversions. Managed Pasture to Forest Land is the most common conversion. This conversion leads to a loss of soil C because pastures are mostly improved in the United States with fertilization and/or irrigation, which enhances C input to soils relative to typical forest management activities.

_

³⁶ The annual NFI data used to compile estimates of carbon transfer and uptake in this section are based on 5- to 10-yr remeasurements so the exact conversion period was limited to the remeasured data over the time series.

³⁷ The estimates reported in this section only include the 48 conterminous states in the United States. Land use conversions to forest land in Alaska are currently included in the Forest Land Remaining Forest Land section because currently there is insufficient data to separate the changes and estimates for Hawaii were not included because there is insufficient NFI data to support inclusion at this time. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.3 Land Converted to Forest Land.

Table 6-24: Net CO₂ Flux from Forest C Pools in Land Converted to Forest Land by Land Use Change Category (MMT CO₂ Eq.)

Land Use/Carbon Pool	1990	200	5	2017	2018	2019	2020	2021
Cropland Converted to Forest Land	(38.5)	(38.	1)	(37.9)	(37.8)	(37.8)	(37.8)	(37.8)
Aboveground Biomass	(22.2)	(22.	O)	(21.9)	(21.9)	(21.9)	(21.9)	(21.9)
Belowground Biomass	(4.3)	(4.	3)	(4.2)	(4.2)	(4.2)	(4.2)	(4.2)
Dead Wood	(4.8)	(4.	8)	(4.8)	(4.8)	(4.8)	(4.8)	(4.8)
Litter	(6.9)	(6.	8)	(6.8)	(6.8)	(6.8)	(6.8)	(6.8)
Mineral Soil	(0.3)	(0.	3)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Grassland Converted to Forest Land	(12.2)	(12.	2)	(12.3)	(12.3)	(12.3)	(12.3)	(12.3)
Aboveground Biomass	(6.1)	(6.	2)	(6.2)	(6.2)	(6.2)	(6.2)	(6.2)
Belowground Biomass	(1.0)	(1.	O)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
Dead Wood	(1.2)	(1.	2)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)
Litter	(4.1)	(4.	1)	(4.1)	(4.1)	(4.1)	(4.1)	(4.1)
Mineral Soil	0.2	0	.3	0.3	0.3	0.3	0.3	0.3
Other Land Converted to Forest Land	(9.9)	(10.	5)	(10.7)	(10.7)	(10.7)	(10.7)	(10.7)
Aboveground Biomass	(4.7)	(4.	7)	(4.8)	(4.8)	(4.8)	(4.8)	(4.8)
Belowground Biomass	(0.8)	(0.	8)	(0.8)	(0.8)	(0.8)	(0.8)	(0.8)
Dead Wood	(1.3)	(1.	3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Litter	(2.5)	(2.	5)	(2.5)	(2.5)	(2.5)	(2.5)	(2.5)
Mineral Soil	(0.6)	(1.	1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Settlements Converted to Forest Land	(34.4)	(34.	2)	(34.0)	(34.0)	(34.0)	(34.0)	(34.0)
Aboveground Biomass	(21.0)	(20.	9)	(20.7)	(20.7)	(20.7)	(20.7)	(20.7)
Belowground Biomass	(4.0)	(4.	O)	(3.9)	(3.9)	(3.9)	(3.9)	(3.9)
Dead Wood	(4.0)	(4.	O)	(3.9)	(3.9)	(3.9)	(3.9)	(3.9)
Litter	(5.4)	(5.	4)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)
Mineral Soil	(0.1)	(0.0	4)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Wetlands Converted to Forest Land	(3.4)	(3.	4)	(3.4)	(3.4)	(3.4)	(3.4)	(3.4)
Aboveground Biomass	(1.5)	(1.	5)	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)
Belowground Biomass	(0.3)	(0.	3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Dead Wood	(0.4)	(0.	4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Litter	(1.3)	(1.	3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Mineral Soil	0.0	0	.0	0.0	0.0	0.0	0.0	0.0
Total Aboveground Biomass Flux	(55.5)	(55.	3)	(55.2)	(55.1)	(55.1)	(55.1)	(55.1)
Total Belowground Biomass Flux	(10.4)	(10.	3)	(10.3)	(10.3)	(10.3)	(10.3)	(10.3)
Total Dead Wood Flux	(11.6)	(11.	6)	(11.6)	(11.6)	(11.6)	(11.6)	(11.6)
Total Litter Flux	(20.1)	(20.	1)	(20.1)	(20.1)	(20.1)	(20.1)	(20.1)
Total Mineral Soil Flux	(0.8)	(1.	1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Total Flux	(98.5)	(98.	4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)

Notes: Totals may not sum due to independent rounding. Parentheses indicate net uptake. Forest ecosystem C stock changes from land conversion in Alaska are currently included in the Forest Land Remaining Forest Land section because there is insufficient data to separate the changes at this time. Forest ecosystem C stock changes from land conversion do not include U.S. Territories because managed forest land in U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes from land conversion do not include Hawaii because there is insufficient NFI data to support inclusion at this time. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.3 Land Converted to Forest Land. The forest ecosystem C stock changes from land conversion do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). It is not possible to separate emissions from drained organic soils between Forest Land Remaining Forest Land and Land Converted to Forest Land so estimates for all organic soils are included in Table 6-8 and Table 6-9 of the Forest Land Remaining Forest Land Remaining

Table 6-25: Net C Flux from Forest C Pools in Land Converted to Forest Land by Land-Use Change Category (MMT C)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Forest							
Land	(10.5)	(10.4)	(10.3)	(10.3)	(10.3)	(10.3)	(10.3)
Aboveground Biomass	(6.1)	(6.0)	(6.0)	(6.0)	(6.0)	(6.0)	(6.0)
Belowground Biomass	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)
Dead Wood	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Litter	(1.9)	(1.9)	(1.8)	(1.8)	(1.8)	(1.8)	(1.8)
Mineral Soil	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Grassland Converted to Forest							
Land	(3.3)	(3.3)	(3.4)	(3.4)	(3.4)	(3.4)	(3.4)
Aboveground Biomass	(1.7)	(1.7)	(1.7)	(1.7)	(1.7)	(1.7)	(1.7)
Belowground Biomass	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Dead Wood	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Litter	(1.0)	(1.0)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Mineral Soil	0.0	0.1	0.1	0.1	0.1	0.1	0.1
Other Land Converted to Forest							
Land	(2.7)	(2.9)	(2.9)	(2.9)	(2.9)	(2.9)	(2.9)
Aboveground Biomass	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Belowground Biomass	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Dead Wood	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Litter	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)
Mineral Soil	(0.2)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Settlements Converted to Forest							
Land	(9.4)	(9.3)	(9.3)	(9.3)	(9.3)	(9.3)	(9.3)
Aboveground Biomass	(5.7)	(5.7)	(5.7)	(5.7)	(5.7)	(5.7)	(5.7)
Belowground Biomass	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Dead Wood	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Litter	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)
Mineral Soil	+	+	+	+	+	+	+
Wetlands Converted to Forest							
Land	(0.9)	(0.9)	(0.9)	(0.9)	(0.9)	(0.9)	(0.9)
Aboveground Biomass	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Belowground Biomass	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Dead Wood	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.3)	(0.3)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Mineral Soil	+	+	+	+	+	+	+
Total Aboveground Biomass Flux	(15.1)	(15.1)	(15.0)	(15.0)	(15.0)	(15.0)	(15.0)
Total Belowground Biomass Flux	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)
Total Dead Wood Flux	(3.2)	(3.2)	(3.2)	(3.2)	(3.2)	(3.2)	(3.2)
Total Litter Flux	(5.5)	(5.5)	(5.5)	(5.5)	(5.5)	(5.5)	(5.5)
Total Mineral Soil Flux	(0.2)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Total Flux	(26.9)	(26.8)	(26.8)	(26.8)	(26.8)	(26.8)	(26.8)

⁺ Absolute value does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net uptake. Forest ecosystem C stock changes from land conversion in Alaska are currently included in the Forest Land Remaining Forest Land section because there is not sufficient data to separate the changes at this time. Forest ecosystem C stock changes from land conversion do not include U.S. Territories because managed forest land in U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes from land conversion do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.3 Land Converted to Forest Land. The forest

ecosystem C stock changes from land conversion do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). It is not possible to separate emissions from drained organic soils between Forest Land Remaining Forest Land and Land Converted to Forest Land so estimates for organic soils are included in Table 6-8 and Table 6-9 of the Forest Land Remaining Forest Land section of the Inventory.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate stock changes in all forest C pools for Land Converted to Forest Land. National Forest Inventory data and IPCC (2006) defaults for reference C stocks were used to compile separate estimates for the five C storage pools. Estimates for Aboveground and Belowground Biomass, Dead Wood and Litter were based on data collected from the extensive array of permanent, annual NFI plots and associated models (e.g., live tree belowground biomass estimates) in the United States (USDA Forest Service 2022b, 2022c). Carbon conversion factors were applied at the individual plot and then appropriately expanded to state population estimates, which are summed to provide the national estimate. To ensure consistency in the Land Converted to Forest Land category where C stock transfers occur between land-use categories, all soil estimates are based on methods from Ogle et al. (2003, 2006) and IPCC (2006).

The methods used for estimating carbon stocks and stock changes in the Land Converted to Forest Land are consistent with those used for Forest Land Remaining Forest Land. For land-use conversion, IPCC (2006) default biomass C stock values were applied in the year of conversion on individual plots to estimate the carbon stocks removed due to land-use conversion from Croplands and Grasslands. There is no biomass loss data or IPCC (2006) defaults to include transfers, losses, or gains of carbon in the year of the conversion for other land use (i.e., Other Lands, Settlements, Wetlands) conversions to Forest Land so these were incorporated for these conversion categories. All annual NFI plots included in the public FIA database as of August 2022 were used in this Inventory. Forest Land conditions were observed on NFI plots at time t_0 and at a subsequent time $t_1=t_0+s$, where s is the time step (time measured in years) and is indexed by discrete (e.g., 5 year) forest age classes. The inventory from t_0 was then projected from t_1 to 2021. This projection approach requires simulating changes in the age-class distribution resulting from forest aging and disturbance events and then applying C density estimates for each age class to obtain population estimates for the nation.

Carbon in Biomass

Live tree C pools include aboveground and belowground (coarse root) biomass of live trees with diameter at breast height (dbh) of at least 2.54 cm at 1.37 m above the forest floor. Separate estimates were made for above and belowground biomass components. If inventory plots included data on individual trees, above- and belowground tree C was based on Woodall et al. (2011a), which is also known as the component ratio method (CRM), and is a function of volume, species, and diameter. An additional component of foliage, which was not explicitly included in Woodall et al. (2011a), was added to each tree following the same CRM method.

Understory vegetation is a minor component of biomass and is defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For the current Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density were based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003). Understory biomass represented over one percent of C in biomass, but its contribution rarely exceeded 2 percent of the total.

Biomass losses associated with conversion from Grassland and Cropland to Forest Land were assumed to occur in the year of conversion. To account for these losses, IPCC (2006) defaults for aboveground and belowground biomass on Grasslands and aboveground biomass on Croplands were subtracted from sequestration in the year of the conversion. As previously discussed, for all other land use (i.e., Other Lands, Settlements, Wetlands) conversions to Forest Land no biomass loss data were available, and no IPCC (2006) defaults currently exist to include transfers, losses, or gains of carbon in the year of the conversion, so none were incorporated for these

conversion categories. As defaults or country-specific data become available for these conversion categories, they will be incorporated.

Carbon in Dead Organic Matter

Dead organic matter was initially calculated as three separate pools—standing dead trees, downed dead wood, and litter—with C stocks estimated from sample data or from models. The standing dead tree C pool includes aboveground and belowground (coarse root) biomass for trees of at least 12.7 cm dbh. Calculations followed the basic method applied to live trees (Woodall et al. 2011a) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). Downed dead wood estimates are based on measurement of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008; Woodall et al. 2013). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots are measured for litter C. A modeling approach, using litter C measurements from FIA plots (Domke et al. 2016) was used to estimate litter C for every FIA plot used in the estimation framework. Dead organic matter C stock estimates are included for all land-use conversions to Forest Land.

Mineral Soil Carbon Stock Changes

A Tier 2 method is applied to estimate mineral soil C stock changes for Land Converted to Forest Land (Ogle et al. 2003, 2006; IPCC 2006). For this method, land is stratified by climate, soil types, land use, and land management activity, and then assigned reference carbon levels and factors for the forest land and the previous land use. The difference between the stocks is reported as the stock change under the assumption that the change occurs over 20 years. Reference C stocks have been estimated from data in the National Soil Survey Characterization Database (USDA-NRCS 1997), and U.S.-specific stock change factors have been derived from published literature (Ogle et al. 2003, 2006). Land use and land-use change patterns are determined from a combination of the Forest Inventory and Analysis Dataset (FIA), the 2015 National Resources Inventory (NRI) (USDA-NRCS 2018), and National Land Cover Dataset (NLCD) (Yang et al. 2018). See Annex 3.12 (Methodology for Estimating N2O Emissions, CH4 Emissions and Soil Organic C Stock Changes from Agricultural Soil Management) for more information about this method. Note that soil C in this Inventory is reported to a depth of 100 cm in the Forest Land Remaining Forest Land category (Domke et al. 2017) while other land-use categories report soil C to a depth of 30 cm. However, to ensure consistency in the Land Converted to Forest Land category where C stock transfers occur between land-use categories, soil C estimates were based on a 30 cm depth using methods from Ogle et al. (2003, 2006) and IPCC (2006), as described in Annex 3.12.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. Mineral soil organic C stock changes from 2016 to 2021 are estimated using a linear extrapolation method described in Box 6-4 of the Methodology section in Cropland Remaining Cropland. The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data and is a standard data splicing method for estimating emissions at the end of a time series if activity data are not available (IPCC 2006). The Tier 2 method described previously will be applied to recalculate the 2016 to 2021 emissions in a future Inventory.

Uncertainty

A quantitative uncertainty analysis placed bounds on the flux estimates for Land Converted to Forest Land through a combination of sample-based and model-based approaches to uncertainty for forest ecosystem CO₂ Eq. flux (IPCC Approach 1). Uncertainty estimates for forest pool C stock changes were developed using the same

methodologies as described in the Forest Land Remaining Forest Land section for aboveground and belowground biomass, dead wood, and litter. The exception was when IPCC default estimates were used for reference C stocks in certain conversion categories (i.e., Cropland Converted to Forest Land and Grassland Converted to Forest Land). In those cases, the uncertainties associated with the IPCC (2006) defaults were included in the uncertainty calculations. IPCC Approach 2 was used for mineral soils and is described in the Cropland Remaining Cropland section.

Uncertainty estimates are presented in Table 6-26 for each land conversion category and C pool. Uncertainty estimates were obtained using a combination of sample-based and model-based approaches for all non-soil C pools (IPCC Approach 1) and a Monte Carlo approach (IPCC Approach 2) was used for mineral soil. Uncertainty estimates were combined using the error propagation model (IPCC Approach 1). The combined uncertainty for all C stocks in Land Converted to Forest Land ranged from 11 percent below to 11 percent above the 2021 C stock change estimate of -98.3 MMT CO_2 Eq.

Table 6-26: Quantitative Uncertainty Estimates for Forest C Pool Stock Changes (MMT CO₂ Eq. per Year) in 2021 from Land Converted to Forest Land by Land Use Change

Land Use/Carbon Pool	2021 Flux Estimate	Uncertainty Range Relative to Flux Range ^a					
	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	((%)		
		Lower	Upper	Lower	Upper		
		Bound	Bound	Bound	Bound		
Cropland Converted to Forest Land	(37.8)	(46.5)	(29.2)	-23%	23%		
Aboveground Biomass	(21.9)	(30.3)	(13.5)	-38%	38%		
Belowground Biomass	(4.2)	(5.3)	(3.2)	-25%	25%		
Dead Wood	(4.8)	(6.0)	(3.5)	-26%	26%		
Litter	(6.8)	(7.8)	(5.7)	-16%	16%		
Mineral Soils	(0.2)	(0.5)	0.1	-135%	135%		
Grassland Converted to Forest Land	(12.3)	(14.8)	(9.9)	-20%	20%		
Aboveground Biomass	(6.2)	(7.6)	(4.9)	-22%	22%		
Belowground Biomass	(1.0)	(1.3)	(0.7)	-28%	28%		
Dead Wood	(1.2)	(1.4)	(1.1)	-12%	12%		
Litter	(4.1)	(4.7)	(3.6)	-13%	13%		
Mineral Soils	0.3	(0.1)	0.6	-137%	137%		
Other Lands Converted to Forest Land	(10.7)	(13.0)	(8.3)	-22%	22%		
Aboveground Biomass	(4.8)	(6.9)	(2.7)	-44%	44%		
Belowground Biomass	(0.8)	(1.3)	(0.4)	-51%	51%		
Dead Wood	(1.3)	(1.9)	(0.8)	-42%	42%		
Litter	(2.5)	(3.2)	(1.9)	-25%	25%		
Mineral Soils	(1.1)	(1.9)	(0.4)	-68%	68%		
Settlements Converted to Forest Land	(34.0)	(40.5)	(27.5)	-19%	19%		
Aboveground Biomass	(20.7)	(26.9)	(14.5)	-30%	30%		
Belowground Biomass	(3.9)	(5.3)	(2.6)	-33%	33%		
Dead Wood	(3.9)	(5.1)	(2.8)	-29%	29%		
Litter	(5.3)	(6.2)	(4.4)	-17%	17%		
Mineral Soil	(0.1)	(0.1)	(0.0)	-47%	47%		
Wetlands Converted to Forest Land	(3.4)	(3.6)	(3.3)	-5%	5%		
Aboveground Biomass	(1.5)	(1.7)	(1.4)	-9%	9%		
Belowground Biomass	(0.3)	(0.3)	(0.3)	-11%	11%		
Dead Wood	(0.4)	(0.4)	(0.3)	-12%	12%		
Litter	(1.3)	(1.3)	(1.2)	-5%	5%		
Mineral Soils	0.0	0.0	0.0	NA	NA		
Total: Aboveground Biomass	(55.1)	(65.9)	(44.4)	-19%	19%		
Total: Belowground Biomass	(10.3)	(12.0)	(8.5)	-17%	17%		
Total: Dead Wood	(11.6)	(13.4)	(9.8)	-15%	15%		
Total: Litter	(20.1)	(21.7)	(18.5)	-8%	8%		

Total: Mineral Soils	(1.1)	(1.7)	(0.6)	-51%	51%
Total: Lands Converted to Forest Lands	(98.3)	(109.4)	(87.1)	-11%	11%

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq.

NA (Not Applicable)

Notes: Totals may not sum due to independent rounding. Parentheses indicate net uptake. It is not possible to separate emissions from drained organic soils between Forest Land Remaining Forest Land and Land Converted to Forest Land so estimates for organic soils are included in Table 6-8 and Table 6-9 of the Forest Land Remaining Forest Land section of the Inventory.

QA/QC and Verification

See QA/QC and Verification sections under Forest Land Remaining Forest Land and, for mineral soil estimates, Cropland Remaining Cropland.

Recalculations Discussion

The approach for estimating carbon stock changes in Land Converted to Forest Land is consistent with the methods used for Forest Land Remaining Forest Land and is described in Annex 3.13. The Land Converted to Forest Land estimates in this Inventory are based on the land-use change information in the annual NFI. All conversions are based on empirical estimates compiled using plot remeasurements from the NFI, IPCC (2006) default biomass C stocks removed from Croplands and Grasslands in the year of conversion on individual plots and the Tier 2 method for estimating mineral soil C stock changes (Ogle et al. 2003, 2006; IPCC 2006). All annual NFI plots included in the public FIA database as of August 2022 were used in this Inventory. This is the fourth year that remeasurement data from the annual NFI were available throughout the conterminous United States (with the exception of Wyoming) to estimate land-use conversion. The availability of remeasurement data from the annual NFI allowed for consistent plot-level estimation of C stocks and stock changes for Forest Land Remaining Forest Land and the Land Converted to Forest Land categories. Estimates in the previous Inventory were based on state-level carbon density estimates and a combination of NRI data and NFI data in the eastern United States. The refined analysis in this Inventory resulted in changes in the Land Converted to Forest Land categories. Overall, the Land Converted to Forest Land C stock changes decreased by approximately 1 percent in 2020 between the previous Inventory and the current Inventory (Table 6-27). This decrease is directly attributed to the incorporation of annual NFI data into the compilation system.

Table 6-27: Recalculations of the Net C Flux from Forest C Pools in Land Converted to Forest Land by Land Use Change Category (MMT C)

Conversion category and Carbon pool (MMT C)	2020 Estimate, Previous Inventory	2020 Estimate, Current Inventory	2021 Estimate, Current Inventory
Cropland Converted to Forest Land	(10.8)	(10.3)	(10.3)
Aboveground Biomass	(6.3)	(6.0)	(6.0)
Belowground Biomass	(1.2)	(1.2)	(1.2)
Dead Wood	(1.4)	(1.3)	(1.3)
Litter	(1.9)	(1.8)	(1.8)
Mineral soil	(0.1)	(0.1)	(0.1)
Grassland Converted to Forest Land	(3.2)	(3.4)	(3.4)
Aboveground Biomass	(1.7)	(1.7)	(1.7)
Belowground Biomass	(0.3)	(0.3)	(0.3)
Dead Wood	(0.3)	(0.3)	(0.3)
Litter	(1.1)	(1.1)	(1.1)
Mineral soil	0.1	0.1	0.1
Other Land Converted to Forest Land	(3.0)	(2.9)	(2.9)

^a Range of flux estimate for 95 percent confidence interval.

Aboveground Biomass	(1.3)	(1.3)	(1.3)
Belowground Biomass	(0.2)	(0.2)	(0.2)
Dead Wood	(0.4)	(0.4)	(0.4)
Litter	(0.7)	(0.7)	(0.7)
Mineral soil	(0.3)	(0.3)	(0.3)
Settlements Converted to Forest Land	(9.3)	(9.3)	(9.3)
Aboveground Biomass	(5.7)	(5.7)	(5.7)
Belowground Biomass	(1.1)	(1.1)	(1.1)
Dead Wood	(1.1)	(1.1)	(1.1)
Litter	(1.5)	(1.5)	(1.5)
Mineral soil	(0.0)	(0.0)	(0.0)
Wetlands Converted to Forest Land	(0.9)	(0.9)	(0.9)
Aboveground Biomass	(0.4)	(0.4)	(0.4)
Belowground Biomass	(0.1)	(0.1)	(0.1)
Dead Wood	(0.1)	(0.1)	(0.1)
Litter	(0.3)	(0.4)	(0.4)
Mineral soil	0.0	0.0	0.0
Total Aboveground Biomass Flux	(15.3)	(15.0)	(15.0)
Total Belowground Biomass Flux	(2.9)	(2.8)	(2.8)
Total Dead Wood Flux	(3.2)	(3.2)	(3.2)
Total Litter Flux	(5.4)	(5.5)	(5.5)
Total SOC (mineral) Flux	(0.3)	(0.3)	(0.3)
Total Flux	(27.1)	(26.8)	(26.8)

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Planned Improvements

There are many improvements necessary to improve the estimation of carbon stock changes associated with landuse conversion to forest land over the entire time series. First, soil C has historically been reported to a depth of 100 cm in the Forest Land Remaining Forest Land category (Domke et al. 2017) while other land-use categories (e.g., Grasslands and Croplands) report soil carbon to a depth of 30 cm. To ensure greater consistency in the Land Converted to Forest Land category where C stock transfers occur between land-use categories, all mineral soil estimates in the Land Converted to Forest Land category in this Inventory are based on methods from Ogle et al. (2003, 2006) and IPCC (2006). Methods have recently been developed (Domke et al. 2017) to estimate soil C to depths of 20, 30, and 100 cm in the Forest Land category using in situ measurements from the Forest Inventory and Analysis program within the USDA Forest Service and the International Soil Carbon Network. In subsequent Inventories, a common reporting depth will be defined for all land-use conversion categories and Domke et al. (2017) will be used in the Forest Land Remaining Forest Land and Land Converted to Forest Land categories to ensure consistent reporting across all forest land. Second, there will be improved methods and models to characterize standing live and dead tree carbon in the next Inventory. Third, due to the 5 to 10-year remeasurement periods within the FIA program and limited land-use change information available over the entire time series, estimates presented in this section may not reflect the entire 20-year conversion history. Work is underway to integrate the dense time series of remotely sensed data into a new estimation system, which will facilitate land conversion estimation over the entire time series.

6.4 Cropland Remaining Cropland (CRF Category 4B1)

Carbon (C) in cropland ecosystems occurs in biomass, dead organic matter, and soils. However, C storage in cropland biomass and dead organic matter is relatively ephemeral and does not need to be reported according to

the IPCC (2006), with the exception of C stored in perennial woody crop biomass, such as citrus groves and apple orchards, in addition to the biomass, downed wood and dead organic matter in agroforestry systems. Within soils, C is found in organic and inorganic forms of C, but soil organic C is the main source and sink for atmospheric CO_2 in most soils. IPCC (2006) recommends reporting changes in soil organic C stocks due to agricultural land use and management activities for mineral and organic soils.³⁸

Well-drained mineral soils typically contain from 1 to 6 percent organic C by weight, whereas mineral soils with high water tables for substantial periods of a year may contain significantly more C (NRCS 1999). Conversion of mineral soils from their native state to agricultural land uses can cause up to half of the soil organic C to be lost to the atmosphere due to enhanced microbial decomposition. The rate and ultimate magnitude of C loss depends on subsequent management practices, climate and soil type (Ogle et al. 2005). Agricultural practices, such as clearing, drainage, tillage, planting, grazing, crop residue management, fertilization, application of biosolids (i.e., treated sewage sludge) and flooding, can modify both organic matter inputs and decomposition, and thereby result in a net C stock change (Paustian et al. 1997a; Lal 1998; Conant et al. 2001; Ogle et al. 2005; Griscom et al. 2017; Ogle et al. 2019). Eventually, the soil can reach a new equilibrium that reflects a balance between C inputs (e.g., decayed plant matter, roots, and organic amendments such as manure and crop residues) and C loss through microbial decomposition of organic matter (Paustian et al. 1997b).

Organic soils, also referred to as histosols, include all soils with more than 12 to 20 percent organic C by weight, depending on clay content (NRCS 1999; Brady and Weil 1999). The organic layer of these soils can be very deep (i.e., several meters), and form under inundated conditions that results in minimal decomposition of plant residues. When organic soils are prepared for crop production, they are drained and tilled, leading to aeration of the soil that accelerates both the decomposition rate and CO₂ emissions.³⁹ Due to the depth and richness of the organic layers, C loss from drained organic soils can continue over long periods of time, which varies depending on climate and composition (i.e., decomposability) of the organic matter (Armentano and Menges 1986). Due to deeper drainage and more intensive management practices, the use of organic soils for annual crop production leads to higher C loss rates than drainage of organic soils in grassland or forests (IPCC 2006).

Cropland Remaining Cropland includes all cropland in an Inventory year that has been cropland for a continuous time period of at least 20 years. This determination is based on the United States Department of Agriculture (USDA) National Resources Inventory (NRI) for non-federal lands (USDA-NRCS 2018a) and the National Land Cover Dataset for federal lands (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015). Cropland includes all land that is used to produce food and fiber, forage that is harvested and used as feed (e.g., hay and silage), in addition to cropland that has been enrolled in the Conservation Reserve Program (CRP)⁴⁰ (i.e., considered set-aside cropland).

There are several discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Cropland Remaining Cropland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Cropland Remaining Cropland Inventory. Second, cropland in Alaska is not included in the Inventory, and third, some miscellaneous croplands are also not included in the Inventory due to limited understanding of greenhouse gas emissions from these management systems (e.g., aquaculture). These differences lead to discrepancies

_

³⁸ Carbon dioxide emissions associated with liming and urea application are also estimated but are included in the Liming and Urea Fertilization sections of the Agriculture chapter of the Inventory.

 $^{^{39}}$ N₂O emissions from drained organic soils are included in the Agricultural Soil Management section of the Agriculture chapter of the Inventory.

⁴⁰ The Conservation Reserve Program (CRP) is a land conservation program administered by the Farm Service Agency (FSA). In exchange for a yearly rental payment, farmers enrolled in the program agree to remove environmentally sensitive land from agricultural production and plant species that will improve environmental health and quality. Contracts for land enrolled in CRP are 10 to 15 years in length. The long-term goal of the program is to re-establish valuable land cover to help improve water quality, prevent soil erosion, and reduce loss of wildlife habitat.

between the managed area in Cropland Remaining Cropland and the cropland area included in the Inventory analysis (Table 6-31). Improvements are underway to incorporate the latest NRI dataset, croplands in Alaska and miscellaneous croplands as part of future C inventories (See Planned Improvements section).

Land use and land management of mineral soils are the largest contributor to total net C stock change, especially in the early part of the time series (see Table 6-28 and Table 6-29). In 2021, mineral soils are estimated to sequester 51.8 MMT CO₂ Eq. from the atmosphere (14.1 MMT C). This rate of C storage in mineral soils represents about a 11 percent decrease in the rate since the initial reporting year of 1990. Carbon dioxide emissions from organic soils are 32.9 MMT CO₂ Eq. (9.0 MMT C) in 2021, which is a 6 percent decrease compared to 1990. In total, United States agricultural soils in Cropland Remaining Cropland sequestered approximately 18.9 MMT CO₂ Eq. (5.2 MMT C) in 2021.

Table 6-28: Net CO₂ Flux from Soil C Stock Changes in Cropland Remaining Cropland (MMT CO₂ Eq.)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Mineral Soils	(58.2)	(62.4)	(55.1)	(49.4)	(47.4)	(56.2)	(51.8)
Organic Soils	35.0	33.4	32.8	32.8	32.9	32.9	32.9
Total Net Flux	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-29: Net CO₂ Flux from Soil C Stock Changes in Cropland Remaining Cropland (MMT C)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Mineral Soils	(15.9)	(17.0)	(15.0)	(13.5)	(12.9)	(15.3)	(14.1)
Organic Soils	9.5	9.1	8.9	8.9	9.0	9.0	9.0
Total Net Flux	(6.3)	(7.9)	(6.1)	(4.5)	(4.0)	(6.4)	(5.2)

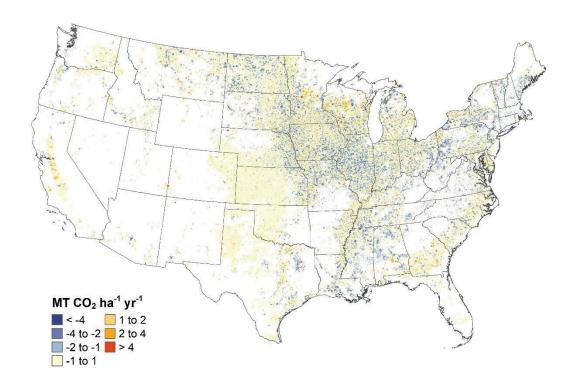
Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Soil organic C stocks increase in Cropland Remaining Cropland largely due to conservation tillage (i.e., reduced- and no-till practices), land set-aside from production in the Conservation Reserve Program, annual crop production with hay or pasture in rotations, and manure amendments. However, there is a decline in the net amount of C sequestration (i.e., 2021 is 18 percent less than 1990 for mineral and organic soils), and this decline is due to lower sequestration rates in set-aside lands, less impact of manure amendments and annual crop production with hay and pasture in rotation. Soil organic C losses from drainage of organic soils are relatively stable across the time series with a small decline associated with the land base declining for Cropland Remaining Cropland on organic soils since 1990.

The spatial variability in the 2015 annual soil organic C stock changes⁴¹ are displayed in Figure 6-6 and Figure 6-7 for mineral and organic soils, respectively. Isolated areas with high rates of C accumulation occur throughout the agricultural land base in the United States, but there are more concentrated areas. In particular, higher rates of net C accumulation in mineral soils occur in the Corn Belt region, which is the region with the largest amounts of conservation tillage, along with moderate rates of CRP enrollment. The regions with the highest rates of emissions from drainage of organic soils occur in the Southeastern Coastal Region (particularly Florida), upper Midwest and Northeast surrounding the Great Lakes, and isolated areas along the Pacific Coast (particularly California), which coincides with the largest concentrations of organic soils in the United States that are used for agricultural production.

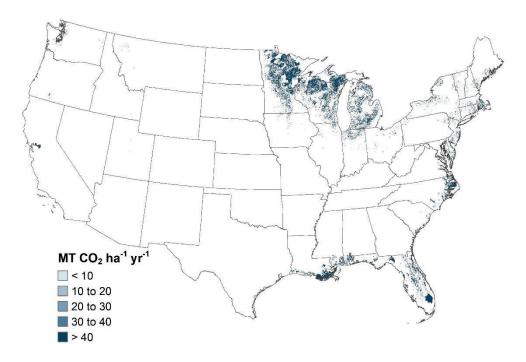
 $^{^{41}}$ Only national-scale emissions are estimated for 2016 to 2021 in this Inventory using the surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Figure 6-6: Total Net Annual Soil C Stock Changes for Mineral Soils under Agricultural Management within States, 2015, Cropland Remaining Cropland



Note: Only national-scale soil organic C stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015. Negative values represent a net increase in soil organic C stocks, and positive values represent a net decrease in soil organic C stocks.

Figure 6-7: Total Net Annual Soil C Stock Changes for Organic Soils under Agricultural Management within States, 2015, Cropland Remaining Cropland



Note: Only national-scale soil organic C stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate changes in soil organic C stocks for Cropland Remaining Cropland, including (1) agricultural land use and management activities on mineral soils; and (2) agricultural land use and management activities on organic soils. Carbon dioxide emissions and removals⁴² due to changes in mineral soil organic C stocks are estimated using a Tier 3 method for the majority of annual crops (Ogle et al. 2010). A Tier 2 IPCC method is used for the remaining crops not included in the Tier 3 method (see list of crops in the Mineral Soil Carbon Stock Changes section below) (Ogle et al. 2003, 2006). In addition, a Tier 2 method is used for very gravelly, cobbly, or shaley soils (i.e., classified as soils that have greater than 35 percent of soil volume comprised of gravel, cobbles, or shale, regardless of crop). Emissions from organic soils are estimated using a Tier 2 IPCC method. While a combination of Tier 2 and 3 methods are used to estimate C stock changes across most of the time series, a surrogate data method has been applied to estimate stock changes in the last few years of the Inventory. Stock change estimates based on surrogate data will be recalculated in a future Inventory report using the Tier 2 and 3 methods when data become available.

Soil organic C stock changes on non-federal lands are estimated for Cropland Remaining Cropland (as well as agricultural land falling into the IPCC categories Land Converted to Cropland, Grassland Remaining Grassland, and Land Converted to Grassland) according to land use histories recorded in the USDA NRI survey (USDA-NRCS 2018a). The NRI is a statistically-based sample of all non-federal land, and includes approximately 489,178 survey locations in agricultural land for the conterminous United States and Hawaii. Each survey location is associated with an

⁴² Removals occur through uptake of CO₂ into crop and forage biomass that is later incorporated into soil C pools.

"expansion factor" that allows scaling of C stock changes from NRI survey locations to the entire country (i.e., each expansion factor represents the amount of area that is expected to have the same land use/management history as the sample point). Land use and some management information (e.g., crop type, soil attributes, and irrigation) are collected for each NRI point on a 5-year cycle beginning from 1982 through 1997. For cropland, data has been collected for 4 out of 5 years during each survey cycle (i.e., 1979 through 1982, 1984 through 1987, 1989 through 1992, and 1994 through 1997). In 1998, the NRI program began collecting annual data, and the annual data are currently available through 2017, however this Inventory uses the previous NRI with annual data through 2015 (USDA-NRCS 2018a). NRI survey locations are classified as Cropland Remaining Cropland in a given year between 1990 and 2015 if the land use has been cropland for a continuous time period of at least 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an overestimation of Cropland Remaining Cropland in the early part of the time series to the extent that some areas are converted to cropland between 1971 and 1978.

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate organic C stock changes for mineral soils on the majority of land that is used to produce annual crops and forage crops that are harvested and used as feed (e.g., hay and silage) in the United States. These crops include alfalfa hay, barley, corn, cotton, grass hay, grass-clover hay, oats, peanuts, potatoes, rice, sorghum, soybeans, sugar beets, sunflowers, tobacco and wheat, but is not applied to estimate organic C stock changes from other crops or rotations with other crops. The modelbased approach uses the DayCent biogeochemical model (Parton et al. 1998; Del Grosso et al. 2001, 2011) to estimate soil organic C stock changes, soil nitrous oxide (N2O) emissions from agricultural soil management, and methane (CH₄) emissions from rice cultivation. Carbon and N dynamics are linked in plant-soil systems through the biogeochemical processes of microbial decomposition and plant production (McGill and Cole 1981). Coupling the two source categories (i.e., agricultural soil C and N2O) in a single inventory analysis ensures that there is a consistent treatment of the processes and interactions between C and N cycling in soils.

The remaining crops on mineral soils are estimated using an IPCC Tier 2 method (Ogle et al. 2003), including some vegetables, perennial/horticultural crops, and crops that are rotated with these crops. The Tier 2 method is also used for very gravelly, cobbly, or shaley soils (greater than 35 percent by volume), and soil organic C stock changes on federal croplands. Mineral soil organic C stocks are estimated using a Tier 2 method for these areas because the DayCent model, which is used for the Tier 3 method, has not been fully tested for estimating C stock changes associated with these crops and rotations, as well as cobbly, gravelly, or shaley soils. In addition, there is insufficient information to simulate croplands on federal lands using DayCent.

A surrogate data method is used to estimate soil organic C stock changes from 2016 to 2021 at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 stock change data that are derived using the Tier 2 and 3 methods. Surrogate data for these regression models include corn and soybean yields from USDA-NASS statistics, ⁴³ and weather data from the PRISM Climate Group (PRISM 2018). See Box 6-4 for more information about the surrogate data method. Stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

⁴³ See https://quickstats.nass.usda.gov/.

Box 6-4: Surrogate Data Method

Time series extension is needed because there are typically gaps at the end of the time series. This is mainly because the NRI, which provides critical data for estimating greenhouse gas emissions and removals, does not release new activity data every year.

A surrogate data method has been used to impute missing emissions at the end of the time series for soil organic C stock changes in Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, and Land Converted to Grassland. A linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to estimate the relationship between the surrogate data and the modeled 1990 to 2015 emissions data that has been compiled using the inventory methods described in this section. The model to extend the time series is given by

$$Y = X\beta + \varepsilon$$
,

where Y is the response variable (e.g., soil organic carbon), $X\beta$ contains specific surrogate data depending on the response variable, and ϵ is the remaining unexplained error. Models with a variety of surrogate data were tested, including commodity statistics, weather data, or other relevant information. Parameters are estimated from the emissions data for 1990 to 2015 using standard statistical techniques, and these estimates are used to predict the missing emissions data for 2016 to 2021.

A critical issue with application of splicing methods is to adequately account for the additional uncertainty introduced by predicting emissions rather than compiling the full inventory. Consequently, uncertainty will increase for years with imputed estimates based on the splicing methods, compared to those years in which the full inventory is compiled. This added uncertainty is quantified within the model framework using a Monte Carlo approach. The approach requires estimating parameters for results in each iteration of the Monte Carlo analysis for the full inventory (i.e., the surrogate data model is refit with the emissions estimated in each Monte Carlo iteration from the full inventory analysis with data from 1990 to 2015), estimating emissions from each model and deriving confidence intervals combining uncertainty across all iterations. This approach propagates uncertainties through the calculations from the original inventory and the surrogate data method. Furthermore, the 95 percent confidence intervals are estimated using the 3 sigma rules assuming a unimodal density (Pukelsheim 1994).

Tier 3 Approach. Mineral soil organic C stocks and stock changes are estimated to a 30 cm depth using the DayCent biogeochemical⁴⁴ model (Parton et al. 1998; Del Grosso et al. 2001, 2011), which simulates cycling of C, N, and other nutrients in cropland, grassland, forest, and savanna ecosystems. The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. Input data on land use and management are specified at a daily resolution and include land-use type, crop/forage type, and management activities (e.g., planting, harvesting, fertilization, manure amendments, tillage, irrigation, cover crops, and grazing; more information is provided below). The model simulates net primary productivity (NPP) using the NASA-CASA production algorithm MODIS Enhanced Vegetation Index (EVI) products, MOD13Q1 and MYD13Q1, for most croplands⁴⁵ (Potter et al. 1993, 2007). The model simulates soil temperature and water dynamics, using daily weather data from a 4-

⁴⁴ Biogeochemical cycles are the flow of chemical elements and compounds between living organisms and the physical environment.

⁴⁵ NPP is estimated with the NASA-CASA algorithm for most of the cropland that is used to produce major commodity crops in the central United States from 2000 to 2015. Other regions and years prior to 2000 are simulated with a method that incorporates water, temperature and moisture stress on crop production (see Metherell et al. 1993), but does not incorporate the additional information about crop condition provided with remote sensing data.

kilometer gridded product developed by the PRISM Climate Group (2018), and soil attributes from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2019). This method is more accurate than the Tier 1 and 2 approaches provided by the IPCC (2006) because the simulation model treats changes as continuous over time as opposed to the simplified discrete changes represented in the default method (see Box 6-5 for additional information).

Box 6-5: Tier 3 Approach for Soil C Stocks Compared to Tier 1 or 2 Approaches

A Tier 3 model-based approach is used to estimate soil organic C stock changes for the majority of agricultural land with mineral soils. This approach results in a more complete and accurate estimation of soil organic C stock changes and entails several fundamental differences from the IPCC Tier 1 or 2 methods, as described below.

- 1) The IPCC Tier 1 and 2 methods are simplified approaches for estimating soil organic C stock changes and classify land areas into discrete categories based on highly aggregated information about climate (six regions), soil (seven types), and management (eleven management systems) in the United States. In contrast, the Tier 3 model incorporates the same variables (i.e., climate, soils, and management systems) with considerably more detail both temporally and spatially, and captures multi-dimensional interactions through the more complex model structure.
- 2) The IPCC Tier 1 and 2 methods have a coarser spatial resolution in which data are aggregated to soil types in climate regions, of which there about 30 combinations in the United States. In contrast, the Tier 3 model simulates soil C dynamics at about 350,000 individual NRI survey locations in crop fields and grazing lands.

The IPCC Tier 1 and 2 methods use a simplified approach for estimating changes in C stocks that assumes a stepchange from one equilibrium level of the C stock to another equilibrium level. In contrast, the Tier 3 approach simulates a continuum of C stock changes that may reach a new equilibrium over an extended period of time depending on the environmental conditions (i.e., a new equilibrium often requires hundreds to thousands of years to reach). More specifically, the DayCent model, which is used in the United States Inventory, simulates soil C dynamics (and CO₂ emissions and uptake) on a daily time step based on C emissions and removals from plant production and decomposition processes. These changes in soil organic C stocks are influenced by multiple factors that affect primary production and decomposition, including changes in land use and management, weather variability and secondary feedbacks between management activities, climate, and soils.

Historical land-use patterns and irrigation histories are simulated with DayCent based on the 2015 USDA NRI survey (USDA-NRCS 2018a). Additional sources of activity data are used to supplement the activity data from the NRI. The USDA-NRCS Conservation Effects and Assessment Project (CEAP) provides data on a variety of cropland management activities, and is used to inform the inventory analysis about tillage practices, mineral fertilization, manure amendments, cover cropping management, as well as planting and harvest dates (USDA-NRCS 2018b; USDA-NRCS 2012). CEAP data are collected at a subset of NRI survey locations, and currently provide management information from approximately 2002 to 2006. These data are combined with other datasets in an imputation analysis that extend the time series from 1990 to 2015. This imputation analysis is comprised of three steps: a) determine the trends in management activity across the time series by combining information across several datasets (discussed below), b) use an artificial neural network to determine the likely management practice at a given NRI survey location (Cheng and Titterington 1994), and c) assign management practices from the CEAP survey to the specific NRI locations using predictive mean matching methods that is adapted to reflect the trending information (Little 1988, van Buuren 2012). The artificial neural network is a machine learning method that approximates nonlinear functions of inputs and searches through a very large class of models to impute an initial value for management practices at specific NRI survey locations. The predictive mean matching method identifies the most similar management activity recorded in the CEAP survey that matches the prediction from the artificial neural network. Predictive mean matching ensures that imputed management activities are realistic for each NRI survey location, and not odd or physically unrealizable results that could be generated by the artificial neural network. There are six complete imputations of the management activity data using these methods.

To determine trends in mineral fertilization and manure amendments from 1979 to 2015, CEAP data are combined with information on fertilizer use and rates by crop type for different regions of the United States from the USDA Economic Research Service. The data collection program was known as the Cropping Practices Surveys through 1995 (USDA-ERS 1997), and is now part of a data collection program known as the Agricultural Resource Management Surveys (ARMS) (USDA-ERS 2018). Additional data on fertilization practices are compiled through other sources particularly the National Agricultural Statistics Service (USDA-NASS 1992, 1999, 2004). The donor survey data from CEAP contain both mineral fertilizer rates and manure amendment rates, so that the selection of a donor via predictive mean matching yields the joint imputation of both rates. This approach captures the relationship between mineral fertilization and manure amendment practices for U.S. croplands based directly on the observed patterns in the CEAP survey data.

To determine the trends in tillage management from 1979 to 2015, CEAP data are combined with Conservation Technology Information Center data between 1989 and 2004 (CTIC 2004) and USDA-ERS Agriculture Resource Management Surveys (ARMS) data from 2002 to 2015 (Claasen et al. 2018). CTIC data are adjusted for long-term adoption of no-till agriculture (Towery 2001). It is assumed that the majority of agricultural lands are managed with full tillage prior to 1985. For cover crops, CEAP data are combined with information from 2011 to 2016 in the USDA Census of Agriculture (USDA-NASS 2012, 2017). It is assumed that cover cropping was minimal prior to 1990 and the rates increased linearly over the decade to the levels of cover crop management derived from the CEAP survey.

Uncertainty in the C stock estimates from DayCent associated with management activity includes input uncertainty due to missing management data in the NRI survey, which is imputed from other sources as discussed above; model uncertainty due to incomplete specification of C and N dynamics in the DayCent model algorithms and associated parameterization; and sampling uncertainty associated with the statistical design of the NRI survey. To assess input uncertainty, the C and N dynamics at each NRI survey location are simulated six times using the imputation product and other model driver data. Uncertainty in parameterization and model algorithms are determined using a structural uncertainty estimator as described in Ogle et al. (2007, 2010). Sampling uncertainty is assessed using the NRI replicate sampling weights.

Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015 using the DayCent model. However, note that the areas have been modified in the original NRI survey through the process in which the Forest Inventory and Analysis (FIA) survey data and the National Land Cover Dataset (Homer et al. 2007; Fry et al. 2011; Homer et al. 2015) are harmonized with the NRI data. This process ensures that the areas of Forest Land Remaining Forest Land and Land Converted to Forest Land are consistent with other land-use categories while maintaining a consistent time series for the total land area of the United States. For example, if the FIA estimate less Cropland Converted to Forest Land than the NRI, then the amount of area for this land-use conversion is reduced in the NRI dataset and re-classified as Cropland Remaining Cropland (See Section 6.1, Representation of the U.S. Land Base for more information). Further elaboration on the methodology and data used to estimate stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 3 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes from 2016 to 2021 are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Time series of activity data will be updated in a future inventory, and emissions from 2016 to 2021 will be recalculated.

Tier 2 Approach. In the IPCC Tier 2 method, data on climate, soil types, land use, and land management activity are used to classify land area and apply appropriate factors to estimate soil organic C stock changes to a 30 cm depth (Ogle et al. 2003, 2006). The primary source of activity data for land use, crop and irrigation histories is the 2015 NRI survey (USDA-NRCS 2018a). Each NRI survey location is classified by soil type, climate region, and management condition using data from other sources. Survey locations on federal lands are included in the NRI, but land use and cropping history are not compiled for these locations in the survey program (i.e., NRI is restricted to data collection on non-federal lands). Therefore, land-use patterns for the NRI survey locations on federal lands are

based on the National Land Cover Database (NLCD) (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007; Homer et al. 2015).

Additional management activities needed for the Tier 2 method are based on the imputation product described for the Tier 3 approach, including tillage practices, mineral fertilization, and manure amendments that are assigned to NRI survey locations. The one exception are activity data on wetland restoration of Conservation Reserve Program land that are obtained from Euliss and Gleason (2002). Climate zones in the United States are classified using mean precipitation and temperature (1950 to 2000) variables from the WorldClim data set (Hijmans et al. 2005) and potential evapotranspiration data from the Consortium for Spatial Information (CGIAR-CSI) (Zomer et al. 2008, 2007) (Figure A-9). IPCC climate zones are then assigned to NRI survey locations.

Reference C stocks are estimated using the National Soil Survey Characterization Database (NRCS 1997) with cultivated cropland as the reference condition, rather than native vegetation as used in IPCC (2006). Soil measurements under agricultural management are much more common and easily identified in the National Soil Survey Characterization Database (NRCS 1997) than are soils under a native condition, and therefore cultivated cropland provides a more robust sample for estimating the reference condition. Country-specific C stock change factors are derived from published literature to determine the impact of management practices on soil organic C storage (Ogle et al. 2003, 2006). The factors represent changes in tillage, cropping rotations, intensification, and land-use change between cultivated and uncultivated conditions. However, country-specific factors associated with organic matter amendments are not estimated due to an insufficient number of studies in the United States to analyze the impacts. Instead, factors from IPCC (2006) are used to estimate the effect of those activities.

Changes in soil organic C stocks for mineral soils are estimated 1,000 times for 1990 through 2015, using a Monte Carlo stochastic simulation approach and probability distribution functions for the country-specific stock change factors, reference C stocks, and land use activity data (Ogle et al. 2003; Ogle et al. 2006). Further elaboration on the methodology and data used to estimate stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, time series of activity data will be updated in a future inventory, and emissions from 2016 to 2021 will be recalculated (see Planned Improvements section).

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Cropland Remaining Cropland are estimated using the Tier 2 method provided in IPCC (2006), with country-specific C loss rates (Ogle et al. 2003) rather than default IPCC rates. The final estimates include a measure of uncertainty as determined from a Monte Carlo Simulation with 1,000 iterations. Emissions are based on the land area data for drained organic soils from 1990 to 2015 for Cropland Remaining Cropland in the 2015 NRI (USDA-NRCS 2018a). Further elaboration on the methodology and data used to estimate stock changes from organic soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the same Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Estimates for 2016 to 2021 will be recalculated in a future inventory when new activity data are incorporated into the analysis.

Uncertainty

Uncertainty is quantified for changes in soil organic C stocks associated with Cropland Remaining Cropland (including both mineral and organic soils). Uncertainty estimates are presented in Table 6-30 for each subsource (mineral and organic soil C stocks) and the methods that are used in the Inventory analyses (i.e., Tier 2 and Tier 3). Uncertainty for the Tier 2 and 3 approaches is derived using a Monte Carlo approach (see Annex 3.12 of EPA 2022 for further discussion). For 2016 to 2021, additional uncertainty is propagated through the Monte Carlo Analysis that is associated with the surrogate data method. Soil organic C stock changes from the Tier 2 and 3 approaches are combined using the simple error propagation method provided by the IPCC (2006). The combined uncertainty is calculated by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities.

The combined uncertainty for soil organic C stocks in Cropland Remaining Cropland ranges from 406 percent below to 406 percent above the 2021 stock change estimate of -18.9 MMT CO_2 Eq. The large relative uncertainty around the 2021 stock change estimate is mostly due to variation in soil organic C stock changes that is not explained by the surrogate data method, leading to high prediction error.

Table 6-30: Approach 2 Quantitative Uncertainty Estimates for Soil C Stock Changes occurring within Cropland Remaining Cropland (MMT CO₂ Eq. and Percent)

Source	2021 Flux Estimate	Uncertainty Range Relative to Flux Estimate ^a						
Source	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)				
		Lower	Upper	Lower	Upper			
		Bound	Bound	Bound	Bound			
Mineral Soil C Stocks: Cropland Remaining	(46.6)	(120.8)	27.6	-159%	159%			
Cropland, Tier 3 Inventory Methodology	(46.6)	(120.8)	27.0	-159%	159%			
Mineral Soil C Stocks: Cropland Remaining	(5.2)	(12.3)	1.8	-134%	134%			
Cropland, Tier 2 Inventory Methodology	(5.2)	(12.5)	1.0	-134%	154%			
Organic Soil C Stocks: Cropland Remaining	32.9	13.9	51.9	-58%	F00/			
Cropland, Tier 2 Inventory Methodology	52.9	15.9	31.9	-36%	58%			
Combined Uncertainty for Flux associated								
with Agricultural Soil Carbon Stock Change in	(18.9)	(95.9)	58.0	-406%	406%			
Cropland Remaining Cropland								

^a Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation with a 95 percent confidence interval. Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Uncertainty is also associated with lack of reporting of agricultural woody biomass and dead organic matter C stock changes. However, woody biomass C stock changes are likely minor in perennial crops, such as orchards and nut plantations. There will be removal and replanting of tree crops each year, but the net effect on biomass C stock changes is probably minor because the overall area and tree density is relatively constant across time series. In contrast, agroforestry practices, such as shelterbelts, riparian forests and intercropping with trees, may have more significant changes over the Inventory time series, compared to perennial woody crops, at least in some regions of the United States, but there are currently no datasets to evaluate the trends. Changes in litter C stocks are also assumed to be negligible in croplands over annual time frames, although there are certainly significant changes at sub-annual time scales across seasons. This trend may change in the future, particularly if crop residue becomes a viable feedstock for bioenergy production.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. Results from the DayCent model are compared to field measurements and soil monitoring sites associated with the NRI (Spencer et al. 2011), and a statistical relationship has been developed to

assess uncertainties in the predictive capability of the model (Ogle et al. 2007). The comparisons include 72 long-term experiment sites and 142 NRI soil monitoring network sites, with 948 observations across all of the sites (see Annex 3.12 of EPA 2022 for more information).

Recalculations Discussion

There are no recalculations in the time series from the previous Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for cropland. This latter improvement will be conducted using the Tier 2 method for mineral and organic soils that is described earlier in this section. The analysis will initially focus on land-use change, which typically has a larger impact on soil organic C stock changes than management practices, but will be further refined over time to incorporate management data. These two improvements will resolve most of the differences between the managed land base for Cropland Remaining Cropland and amount of area currently included in Cropland Remaining Cropland Inventory (See Table 6-31).

Table 6-31: Comparison of Managed Land Area in Cropland Remaining Cropland and Area in the Current Cropland Remaining Cropland Inventory (Thousand Hectares)

	Area (1	Thousand Hecta	res)
Year	Managed Land	Inventory	Difference
1990	162,265	162,134	131
1991	161,834	161,692	142
1992	161,336	161,223	113
1993	159,567	159,420	147
1994	157,880	157,703	178
1995	157,269	157,025	244
1996	156,630	156,380	250
1997	156,010	155,738	271
1998	152,330	151,987	343
1999	151,429	151,105	324
2000	151,246	150,952	294
2001	150,725	150,442	283
2002	150,417	150,146	271
2003	151,043	150,814	229
2004	150,769	150,616	153
2005	150,400	150,275	126
2006	149,893	149,762	131
2007	150,100	150,003	97
2008	149,706	149,694	11
2009	149,646	149,714	-68
2010	149,215	149,314	-100
2011	148,619	148,815	-195
2012	148,290	148,495	-205
2013	148,653	148,989	-336
2014	149,136	149,463	-327

2015	148,520	148,851	-331
2016	148,432	*	*
2017	148,327	*	*
2018	149,721	*	*
2019	149,504	*	*
2020	149,817	*	*
2021	150,586	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

There are several other planned improvements underway related to the plant production module in DayCent. A key improvement for a future Inventory will be to incorporate additional management activity data from the USDA-NRCS Conservation Effects Assessment Project survey. The CEAP survey has compiled new data in recent years. Crop parameters associated with temperature effects on plant production will be further improved in DayCent with additional model calibration. Senescence events following grain filling in crops, such as wheat, are being modified based on recent model algorithm development, and will be incorporated. There will also be further testing and parameterization of the DayCent model to reduce the bias in model predictions for grasslands, which was discovered through model evaluation by comparing output to measurement data from 72 experimental sites and 142 NRI soil monitoring network sites (See QA/QC and Verification section).

Improvements are underway to simulate crop residue burning in the DayCent model based on the amount of crop residues burned according to the data that are used in the Field Burning of Agricultural Residues source category (see Section 5.7). This improvement will more accurately represent the C inputs to the soil that are associated with residue burning. In addition, a review of available data on biosolids (i.e., treated sewage sludge) application will be undertaken to improve the distribution of biosolids application on croplands, grasslands and settlements.

Many of these improvements are expected to be completed for the 1990 through 2022 Inventory (i.e., 2024 submission to the UNFCCC). However, the timeline may be extended if there are insufficient resources to fund all or part of these planned improvements.

6.5 Land Converted to Cropland (CRF Category 4B2)

Land Converted to Cropland includes all cropland in an inventory year that had been in another land use(s) during the previous 20 years (USDA-NRCS 2018), and used to produce food or fiber, or forage that is harvested and used as feed (e.g., hay and silage). For example, Grassland or Forest Land Converted to Cropland during the past 20 years would be reported in this category. Recently converted lands are retained in this category for 20 years as recommended by IPCC (2006).

Land-use change can lead to large losses of C to the atmosphere, particularly conversions from forest land (Houghton et al. 1983; Houghton and Nassikas 2017). Moreover, conversion of forest to another land use (i.e., deforestation) is one of the largest anthropogenic sources of emissions to the atmosphere globally, although this source may be declining according to a recent assessment (Tubiello et al. 2015).

The 2006 IPCC Guidelines recommend reporting changes in biomass, dead organic matter and soil organic C stocks with land-use change. All soil organic C stock changes are estimated and reported for Land Converted to Cropland, but reporting of C stock changes for aboveground and belowground biomass, dead wood, and litter pools is limited

to Forest Land Converted to Cropland and Grassland Converted Cropland for woodland conversions (i.e., woodland conversion to cropland).46

There are several discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Land Converted to Cropland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Land Converted to Cropland Inventory. Second, cropland in Alaska is not included in the Inventory, but is a relatively small amount of U.S. cropland area (approximately 28,700 hectares). Third, some miscellaneous croplands are also not included in the Inventory due to limited understanding of greenhouse gas emissions from these management systems (e.g., aquaculture). These differences lead to small discrepancies between the managed area in Land Converted to Cropland and the cropland area included in the Land Converted to Cropland Inventory analysis (Table 6-35). Improvements are underway to incorporate the latest NRI dataset, croplands in Alaska and miscellaneous croplands as part of future C inventories (See Planned Improvements section).

Forest Land Converted to Cropland is the largest source of emissions from 1990 to 2021, accounting for approximately 86 percent of the average total loss of C among all of the land-use conversions in Land Converted to Cropland. The pattern is due to the large losses of biomass and dead organic matter C for Forest Land Converted to Cropland. The next largest source of emissions is Grassland Converted to Cropland accounting for approximately 17 percent of the total emissions (Table 6-32 and Table 6-33). The net change in total C stocks for 2021 led to CO2 emissions to the atmosphere of 56.5 MMT CO₂ Eq. (15.4 MMT C), including 29.8 MMT CO₂ Eq. (8.1 MMT C) from aboveground biomass C losses, 5.8 MMT CO₂ Eq. (1.6 MMT C) from belowground biomass C losses, 5.8 MMT CO₂ Eq. (1.6 MMT C) from dead wood C losses, 8.2 MMT CO₂ Eq. (2.2 MMT C) from litter C losses, 3.2 MMT CO₂ Eq. (0.9 MMT C) from mineral soils and 3.8 MMT CO₂ Eq. (1.0 MMT C) from drainage and cultivation of organic soils. Emissions in 2021 are 3 percent higher than emissions in the initial reporting year, i.e., 1990.

Table 6-32: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Land Converted to Cropland by Land Use Change Category (MMT CO₂ Eq.)

	1990	2005	2017	2018	2019	2020	2021
Grassland Converted to Cropland	8.0	8.6	9.8	9.6	9.6	9.9	9.8
Aboveground Live Biomass	0.6	0.6	0.6	0.6	0.6	0.6	0.6
Belowground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Wood	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Litter	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Mineral Soils	4.1	4.0	5.4	5.1	5.1	5.5	5.3
Organic Soils	2.7	3.5	3.3	3.3	3.3	3.3	3.3
Forest Land Converted to Cropland	48.2	48.1	48.5	48.5	48.5	48.5	48.5
Aboveground Live Biomass	28.8	28.9	29.2	29.2	29.2	29.2	29.2
Belowground Live Biomass	5.6	5.6	5.7	5.7	5.7	5.7	5.7
Dead Wood	5.5	5.5	5.5	5.5	5.5	5.5	5.5
Litter	7.8	7.8	8.0	8.0	8.0	8.0	8.0
Mineral Soils	0.4	0.2	0.1	0.1	0.1	0.2	0.1
Organic Soils	0.1	0.1	+	+	+	+	+
Other Lands Converted to Cropland	(2.2)	(2.9)	(2.2)	(2.2)	(2.3)	(2.3)	(2.3)
Mineral Soils	(2.3)	(2.9)	(2.2)	(2.2)	(2.3)	(2.3)	(2.3)
Organic Soils	0.2	0.1	+	+	+	+	+
Settlements Converted to Cropland	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Mineral Soils	(0.1)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Organic Soils	+	+	+	+	+	+	+

 $^{^{}m 46}$ Changes in biomass C stocks are estimated for Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversions. There is a planned improvement to include the effect of other land-use conversions, in addition to herbaceous grassland conversions to cropland in a future Inventory. Note: changes in dead organic matter are assumed negligible for other land-use conversions to cropland, except Forest Land and woodland conversions.

Wetlands Converted to Cropland	0.8	0.9	0.6	0.6	0.6	0.6	0.7
Mineral Soils	0.3	0.3	0.2	0.2	0.2	0.2	0.2
Organic Soils	0.6	0.6	0.3	0.4	0.4	0.4	0.4
Aboveground Live Biomass	29.4	29.5	29.8	29.8	29.8	29.8	29.8
Belowground Live Biomass	5.7	5.7	5.8	5.8	5.8	5.8	5.8
Dead Wood	5.7	5.7	5.8	5.8	5.8	5.8	5.8
Litter	8.0	8.1	8.2	8.2	8.2	8.2	8.2
Total Mineral Soil Flux	2.3	1.3	3.4	3.1	3.0	3.5	3.2
Total Organic Soil Flux	3.7	4.3	3.7	3.7	3.7	3.8	3.8
Total Net Flux	54.8	54.7	56.6	56.3	56.3	56.7	56.5

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-33: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Land Converted to Cropland (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Grassland Converted to Cropland	2.2	2.4	2.7	2.6	2.6	2.7	2.7
Aboveground Live Biomass	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Litter	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Mineral Soils	1.1	1.1	1.5	1.4	1.4	1.5	1.5
Organic Soils	0.7	1.0	0.9	0.9	0.9	0.9	0.9
Forest Land Converted to Cropland	13.1	13.1	13.2	13.2	13.2	13.2	13.2
Aboveground Live Biomass	7.9	7.9	8.0	8.0	8.0	8.0	8.0
Belowground Live Biomass	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Dead Wood	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Litter	2.1	2.1	2.2	2.2	2.2	2.2	2.2
Mineral Soils	0.1	+	+	+	+	+	+
Organic Soils	+	+	+	+	+	+	+
Other Lands Converted to Cropland	(0.6)	(0.8)	(0.6)	(0.6)	(0.6)	(0.6)	(0.6)
Mineral Soils	(0.6)	(0.8)	(0.6)	(0.6)	(0.6)	(0.6)	(0.6)
Organic Soils	+	+	+	+	+	+	+
Settlements Converted to Cropland	+	+	+	+	+	+	+
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to Cropland	0.2	0.3	0.2	0.2	0.2	0.2	0.2
Mineral Soils	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Organic Soils	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Aboveground Live Biomass	8.0	8.1	8.1	8.1	8.1	8.1	8.1
Belowground Live Biomass	1.6	1.6	1.6	1.6	1.6	1.6	1.6
Dead Wood	1.6	1.6	1.6	1.6	1.6	1.6	1.6
Litter	2.2	2.2	2.2	2.2	2.2	2.2	2.2
Total Mineral Soil Flux	0.6	0.4	0.9	0.8	0.8	0.9	0.9
Total Organic Soil Flux	1.0	1.2	1.0	1.0	1.0	1.0	1.0
Total Net Flux	14.9	14.9	15.4	15.4	15.3	15.5	15.4

⁺ Does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Land Converted to Cropland, including (1) loss of aboveground and belowground biomass, dead wood and litter C with conversion of forest lands to croplands, as well as (2) the impact from all land-use conversions to cropland on mineral and soil organic C stocks.

Biomass, Dead Wood and Litter Carbon Stock Changes

A Tier 2 method is applied to estimate biomass, dead wood, and litter C stock changes for Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversions. Estimates are calculated in the same way as those in the Forest Land Remaining Forest Land category using data from the USDA Forest Service, Forest Inventory and Analysis (FIA) program (USDA Forest Service 2022). However, there are no country-specific data for cropland biomass, so default biomass values (IPCC 2006) were used to estimate the carbon stocks for the new cropland (litter and dead wood carbon stocks were assumed to be zero since no reference C density estimates exist for croplands). The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion. If FIA plots include data on individual trees, aboveground and belowground C density estimates are based on Woodall et al. (2011). Aboveground and belowground biomass estimates also include live understory which is a minor component of biomass defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density are based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003).

For dead organic matter, if FIA plots include data on standing dead trees, standing dead tree C density is estimated following the basic method applied to live trees (Woodall et al. 2011) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). If FIA plots include data on downed dead wood, downed dead wood C density is estimated based on measurements of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots are measured for litter C. If FIA plots include litter material, a modeling approach using litter C measurements from FIA plots is used to estimate litter C density (Domke et al. 2016). In order to ensure time-series consistency, the same methods are applied from 1990 to 2021 so that changes reflect anthropogenic activity and not methodological adjustments. See Annex 3.13 for more information about reference C density estimates for forest land and the compilation system used to estimate carbon stock changes from forest land. See the Grassland Remaining Grassland section for more information about estimation of biomass, deadwood and litter C stock changes for woodlands.

Soil Carbon Stock Changes

Soil organic stock changes are estimated for Land Converted to Cropland according to land use histories recorded in the 2015 USDA NRI survey for non-federal lands (USDA-NRCS 2018). Land use and some management information (e.g., crop type, soil attributes, and irrigation) had been collected for each NRI point on a 5-year cycle beginning in 1982. In 1998, the NRI program began collecting annual data, which are currently available through 2017, however this Inventory uses the previous NRI with annual data available through 2015 (USDA-NRCS 2018). NRI survey locations are classified as Land Converted to Cropland in a given year between 1990 and 2015 if the land use is cropland but had been another use during the previous 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998, which may have led to an underestimation of Land Converted to Cropland in the early part of the time series to the extent that some areas are converted to cropland from 1971 to 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate C stock changes from 1990 to 2015 for mineral soils on the majority of land that is used to produce annual crops and forage crops that are harvested and used as feed (e.g., hay and silage) in the United States. These crops include alfalfa hay, barley, corn, cotton, grass hay, grass-clover hay, oats, peanuts, potatoes, rice, sorghum, soybeans, sugar beets, sunflowers, tobacco, and wheat. Soil organic C stock changes on the remaining mineral soils are estimated with the IPCC Tier 2 method (Ogle et al. 2003), including land used to produce some vegetables and perennial/horticultural crops and crops rotated with these crops; land on very gravelly, cobbly, or shaley soils (greater than 35 percent by volume); and land converted from another land use or federal ownership. ⁴⁷

For the years 2016 to 2021, a surrogate data method is used to estimate soil organic C stock changes at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 stock change data from the Tier 2 and 3 methods. Surrogate data for these regression models include corn and soybean yields from USDA-NASS statistics, ⁴⁸ and weather data from the PRISM Climate Group (PRISM 2018). See Box 6-4 in the Methodology section of Cropland Remaining Cropland for more information about the surrogate data method. Stock change estimates for 2016 to 2021 will be recalculated in future Inventories when the time series of activity data are updated.

Tier 3 Approach. For the Tier 3 method, mineral soil organic C stocks and stock changes are estimated using the DayCent biogeochemical model (Parton et al. 1998; Del Grosso et al. 2001, 2011). The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. National estimates are obtained by using the model to simulate historical land-use change patterns as recorded in the USDA NRI survey (USDA-NRCS 2018). Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015. See the Cropland Remaining Cropland section and Annex 3.12 of EPA (2022) for additional discussion of the Tier 3 methodology for mineral soils.

In order to ensure time-series consistency, the Tier 3 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. Soil organic C stock changes from 2016 to 2021 are approximated using a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (described in Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Time series of activity data will be updated in a future Inventory, and emissions from 2016 to 2021 will be recalculated.

Tier 2 Approach. For the mineral soils not included in the Tier 3 analysis, soil organic C stock changes are estimated using a Tier 2 Approach, as described in the Tier 2 Approach for mineral soils in Cropland Remaining Cropland. In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the 2016 to 2021 time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, time series of activity data will be updated in a future Inventory, and emissions from 2016 to 2021 will be recalculated.

-

⁴⁷ Federal land is not a land use, but rather an ownership designation that is treated as grassland for purposes of these calculations. The specific land use on federal lands is not identified in the NRI survey (USDA-NRCS 2018).

⁴⁸ See https://quickstats.nass.usda.gov/.

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Land Converted to Cropland are estimated using the Tier 2 method provided in IPCC (2006), with country-specific C loss rates (Ogle et al. 2003) as described in the Cropland Remaining Cropland section for organic soils. Further elaboration on the methodology is also provided in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series (i.e., 2016 to 2021) are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Estimates for 2016 to 2021 will be recalculated in a future inventory when new activity data are incorporated into the analysis.

Uncertainty

The uncertainty analyses for biomass, dead wood and litter C losses with Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversions are conducted in the same way as the uncertainty assessment for forest ecosystem C flux associated with Forest Land Remaining Forest Land. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006) by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details, see the Uncertainty Analysis in Annex 3.13.

The uncertainty analyses for mineral soil organic C stock changes using the Tier 3 and Tier 2 methodologies are based on a Monte Carlo approach that is described in Cropland Remaining Cropland. The uncertainty for annual C emission estimates from drained organic soils in Land Converted to Cropland is estimated using a Monte Carlo approach, which is also described in the Cropland Remaining Cropland section. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo Analysis associated with the surrogate data method, which is also described in Cropland Remaining Cropland.

Uncertainty estimates are presented in Table 6-34 for each subsource (i.e., biomass C stocks, dead wood C stocks, litter C stocks, soil organic C stocks for mineral and organic soils) and the method applied in the Inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates for the total C stock changes for biomass, dead organic matter and soils are combined using the simple error propagation methods provided by the IPCC (2006), as discussed in the previous paragraph. The combined uncertainty for total C stocks in Land Converted to Cropland ranged from 94 percent below to 94 percent above the 2021 stock change estimate of 56.5 MMT CO₂ Eq. The large relative uncertainty in the 2021 estimate is mostly due to variation in soil organic C stock changes that is not explained by the surrogate data method, leading to high prediction error with this splicing method.

Table 6-34: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Cropland (MMT CO₂ Eq. and Percent)

Source	2021 Flux Estimate	Uncertainty Range Relative to Flux Estimate ^a					
Source	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)			
		Lower	Upper	Lower	Upper		
		Bound	Bound	Bound	Bound		
Grassland Converted to Cropland	9.8	(25.6)	45.1	-362%	362%		
Aboveground Live Biomass	0.6	(0.1)	1.3	-125%	125%		
Belowground Live Biomass	0.1	+	0.2	-137%	120%		
Dead Wood	0.2	(0.1)	0.5	-134%	123%		
Litter	0.2	(0.1)	0.5	-134%	119%		
Mineral Soil C Stocks: Tier 3	1.0	(34.1)	36.1	-3,546%	3,546%		

Mineral Soil C Stocks: Tier 2	4.3	1.2	7.4	-71%	71%
Organic Soil C Stocks: Tier 2	3.3	0.8	5.8	-75%	75%
Forest Land Converted to Cropland	48.5	8. 7	88.3	-82%	82%
Aboveground Live Biomass	29.2	(7.9)	66.4	-127%	127%
3					
Belowground Live Biomass	5.7	(1.5)	12.9	-127%	127%
Dead Wood	5.5	(1.5)	12.6	-127%	127%
Litter	8.0	(2.2)	18.1	-127%	127%
Mineral Soil C Stocks: Tier 2	0.1	(0.1)	0.4	-145%	145%
Organic Soil C Stocks: Tier 2	+	(0.1)	0.2	-2,595%	2,595%
Other Lands Converted to Cropland	(2.3)	(3.8)	(0.8)	-66%	66%
Mineral Soil C Stocks: Tier 2	(2.3)	(3.8)	(0.8)	-66%	66%
Organic Soil C Stocks: Tier 2	+	+	+	0%	0%
Settlements Converted to Cropland	(0.1)	(0.3)	+	-116%	116%
Mineral Soil C Stocks: Tier 2	(0.2)	(0.3)	+	-90%	90%
Organic Soil C Stocks: Tier 2	+	+	0.1	-85%	85%
Wetlands Converted to Croplands	0.7	+	1.3	-98%	98%
Mineral Soil C Stocks: Tier 2	0.2	+	0.5	-110%	110%
Organic Soil C Stocks: Tier 2	0.4	(0.2)	1.0	-142%	142%
Total: Land Converted to Cropland	56.5	3.2	109.8	-94%	94%
Aboveground Live Biomass	29.8	(7.3)	67.0	-125%	125%
Belowground Live Biomass	5.8	(1.4)	13.0	-125%	125%
Dead Wood	5.8	(1.3)	12.8	-123%	122%
Litter	8.2	(1.9)	18.3	-124%	124%
Mineral Soil C Stocks: Tier 3	1.0	(34.1)	36.1	-3,546%	3,546%
Mineral Soil C Stocks: Tier 2	2.2	(1.2)	5.7	-155%	155%
Organic Soil C Stocks: Tier 2	3.8	1.2	6.4	-68%	68%
- D - 1 - 10 0E MAT 00 - E	•	•	•	•	

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Uncertainty is also associated with lack of reporting of agricultural biomass and dead organic matter C stock changes. Biomass C stock changes are likely minor in perennial crops, such as orchards and nut plantations, given the small amount of change in land that is used to produce these commodities in the United States. In contrast, agroforestry practices, such as shelterbelts, riparian forests and intercropping with trees, may have led to larger changes in biomass C stocks at least in some regions of the United States. However, there are currently no datasets to evaluate the trends. Changes in dead organic matter C stocks are assumed to be negligible with conversion of land to croplands with the exception of forest lands, which are included in this analysis. This assumption will be further explored in a future Inventory.

QA/QC and Verification

See the QA/QC and Verification section in Cropland Remaining Cropland for information on QA/QC steps.

Recalculations Discussion

Recalculations are associated with new FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Grassland Converted to Cropland (i.e., woodland conversion to cropland), updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Cropland, and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Cropland has an estimated larger C loss of 2.6 MMT CO₂ Eq. on average over the time series. This represents a 4.9 percent increase in C stock changes for Land Converted to Grassland compared to the previous Inventory.

^a Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval. Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Planned Improvements

There are two key improvements planned for the Inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for cropland. These two improvements will resolve most of the discrepancies between the managed land base for Land Converted to Cropland and amount of area currently included in Land Converted to Cropland Inventory (See Table 6-35). Another planned improvement is to estimate the biomass C stock changes for other land-use changes besides Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversion. Additional planned improvements are discussed in the Planned Improvements section of Cropland Remaining Cropland.

Table 6-35: Comparison of Managed Land Area in Land Converted to Cropland and the Area in the current Land Converted to Cropland Inventory (Thousand Hectares)

	Area (Thousand Hecta	ares)
Year	Managed Land	Inventory	Difference
1990	12,230	12,308	-77
1991	12,561	12,654	-94
1992	12,858	12,943	-85
1993	14,093	14,218	-125
1994	15,266	15,400	-134
1995	15,439	15,581	-143
1996	15,740	15,888	-148
1997	15,919	16,073	-154
1998	17,263	17,440	-177
1999	17,659	17,819	-160
2000	17,518	17,693	-175
2001	17,441	17,600	-158
2002	17,311	17,487	-177
2003	16,064	16,257	-194
2004	15,136	15,317	-182
2005	15,221	15,424	-202
2006	15,149	15,410	-262
2007	14,734	14,923	-189
2008	14,248	14,399	-150
2009	13,762	13,814	-52
2010	13,888	13,905	-17
2011	14,209	14,186	22
2012	14,450	14,429	21
2013	13,991	13,752	239
2014	13,464	13,050	414
2015	13,561	13,049	512
2016	13,519	*	*
2017	13,594	*	*
2018	11,673	*	*
2019	11,189	*	*
2020	10,293	*	*
2021	9,491	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

Grassland Remaining Grassland (CRF 6.6 Category 4C1)

Carbon (C) in grassland ecosystems occurs in biomass, dead organic matter, and soils. Soils are the largest pool of C in grasslands, and have the greatest potential for longer-term storage or release of C. Biomass and dead organic matter C pools are relatively ephemeral compared to the soil C pool, with the exception of C stored in tree and shrub biomass that occurs in grasslands. The 2006 IPCC Guidelines recommend reporting changes in biomass, dead organic matter and soil organic C stocks with land use and management. C stock changes for aboveground and belowground biomass, dead wood and litter pools are reported for woodlands (i.e., a subcategory of grasslands⁴⁹), and may be extended to include agroforestry management associated with grasslands in the future. For soil organic C, the 2006 IPCC Guidelines (IPCC 2006) recommend reporting changes due to (1) agricultural land use and management activities on mineral soils, and (2) agricultural land use and management activities on organic soils. 50

Grassland Remaining Grassland includes all grassland in an Inventory year that had been grassland for a continuous time period of at least 20 years (USDA-NRCS 2018). Grassland includes pasture and rangeland that are primarily, but not exclusively used for livestock grazing. Rangelands are typically extensive areas of native grassland that are not intensively managed, while pastures are typically seeded grassland (possibly following tree removal) that may also have additional management, such as irrigation or interseeding of legumes. Woodlands are also considered grassland and are areas of continuous tree cover that do not meet the definition of forest land (See Land Representation section for more information about the criteria for forest land).

There are two discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Grassland Remaining Grassland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not yet been incorporated into the Grassland Remaining Grassland Inventory. Second, grassland in Alaska is not included in the Inventory, and is approximately 50 million hectares. These differences lead to discrepancies between the managed area in Grassland Remaining Grassland and the grassland area included in the Grassland Remaining Grassland Inventory analysis (Table 6-39). Improvements are underway to incorporate the latest NRI dataset, and grasslands in Alaska as part of future C inventories (See Planned Improvements section).

For Grassland Remaining Grassland, there has been considerable variation in C stocks between 1990 and 2021. These changes are driven by variability in weather patterns and associated interaction with land management activity. Moreover, changes are small on a per hectare rate basis across the time series even in the years with a larger total change in stocks. The net change in total C stocks for 2021 led to net CO2 emissions to the atmosphere of 10.0 MMT CO₂ Eq. (2.7 MMT C), including 2.1 MMT CO₂ Eq. (0.6 MMT C) from net losses of aboveground biomass C, 0.3 MMT CO₂ Eq. (0.1 MMT C) from net losses in belowground biomass C, 3.0 MMT CO₂ Eq. (0.8 MMT C) from net losses in dead wood C, less than 0.05 MMT CO₂ Eq. (less than 0.05 MMT C) from net gains in litter C, 0.8 MMT CO₂ Eq. (0.2 MMT C) from net gains in mineral soil organic C, and 5.4 MMT CO₂ Eq. (1.5 MMT C) from losses of C due to drainage and cultivation of organic soils (Table 6-36 and Table 6-37). Losses of carbon are 15 percent higher in 2021 compared to 1990, but as noted previously, stock changes are highly variable from 1990 to 2021, with an average annual change of 9.4 MMT CO₂ Eq. (2.6 MMT C).

⁴⁹ Woodlands are considered grasslands in the U.S. Land Representation because they do not meet the definition of forest

⁵⁰ CO₂ emissions associated with liming and urea fertilization are also estimated but included in the Agriculture chapter of the report.

Table 6-36: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Grassland Remaining Grassland (MMT CO₂ Eq.)

	1990	2005	2017	2018	2019	2020	2021
Aboveground Live Biomass	1.4	1.7	2.1	2.1	2.1	2.1	2.1
Belowground Live Biomass	0.2	0.3	0.3	0.3	0.3	0.3	0.3
Dead Wood	3.2	3.2	3.0	3.0	3.0	3.0	3.0
Litter	(0.3)	(0.1)	+	+	+	+	+
Mineral Soils	(2.2)	0.8	0.1	0.4	3.2	(4.8)	(0.8)
Organic Soils	6.3	5.2	5.4	5.4	5.4	5.4	5.4
Total Net Flux	8.7	11.0	10.9	11.3	14.0	6.0	10.0

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-37: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Grassland Remaining Grassland (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Aboveground Live Biomass	0.4	0.5	0.6	0.6	0.6	0.6	0.6
Belowground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Wood	0.9	0.9	0.8	0.8	0.8	0.8	0.8
Litter	(0.1)	+	+	+	+	+	+
Mineral Soils	(0.6)	0.2	+	0.1	0.9	(1.3)	(0.2)
Organic Soils	1.7	1.4	1.5	1.5	1.5	1.5	1.5
Total Net Flux	2.4	3.0	3.0	3.1	3.8	1.6	2.7

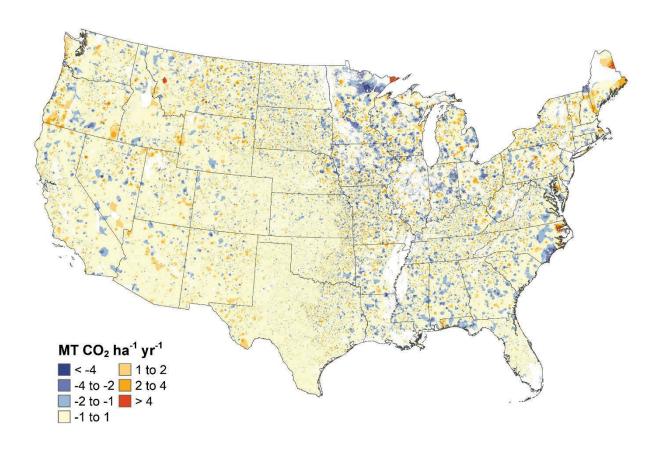
⁺ Does not exceed 0.05 MMT C

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

The spatial variability in soil organic C stock changes for 2015⁵¹ is displayed in Figure 6-8 for mineral soils and in Figure 6-9 for organic soils. Although relatively small on a per-hectare basis, grassland soils gained C in isolated areas that mostly occurred in pastures of the eastern United States. For organic soils, the regions with the highest rates of emissions coincide with the largest concentrations of organic soils used for managed grassland, including the Southeastern Coastal Region (particularly Florida), upper Midwest and Northeast, and a few isolated areas along the Pacific Coast.

⁵¹ Only national-scale emissions are estimated for 2016 to 2021 in the current Inventory using the surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Figure 6-8: Total Net Annual Soil C Stock Changes for Mineral Soils under Agricultural Management within States, 2015, Grassland Remaining Grassland



Note: Only national-scale soil organic C stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015. Negative values represent a net increase in soil organic C stocks, and positive values represent a net decrease in soil organic C stocks.

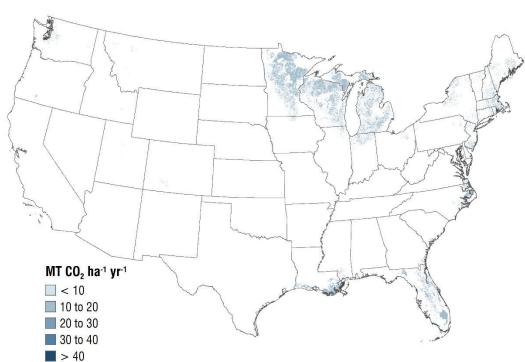


Figure 6-9: Total Net Annual Soil C Stock Changes for Organic Soils under Agricultural Management within States, 2015, Grassland Remaining Grassland

Note: Only national-scale soil organic carbon stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Grassland Remaining Grassland, including (1) aboveground and belowground biomass, dead wood and litter C for woodlands, as well as (2) soil organic C stocks for mineral and organic soils.

Biomass, Dead Wood and Litter Carbon Stock Changes

Woodlands are lands that do not meet the definition of forest land or agroforestry (see Section 6.1 Representation of the U.S. Land Base), but include woody vegetation with C storage in aboveground and belowground biomass, dead wood and litter C (IPCC 2006) as described in the Forest Land Remaining Forest Land section. Carbon stocks and net annual C stock change were determined according to the stock-difference method for the conterminous United States, which involved applying C estimation factors to annual forest inventories across time to obtain C stocks and then subtracting the values between years to estimate the stock changes. The methods for estimating carbon stocks and stock changes for woodlands in Grassland Remaining Grassland are consistent with those in the Forest Land Remaining Forest Land section and are described in Annex 3.13. All annual National Forest Inventory (NFI) plots available in the public FIA database (USDA Forest Service 2022) were used in the current Inventory. While the NFI is an all-lands inventory, only those plots that meet the definition of forest land are typically measured. However, in some cases, particularly in the Central Plains and Southwest United States, woodlands have been measured as part of the survey. This analysis is limited to those plots and is not considered a comprehensive assessment of trees outside of forest land that meet the definition of grassland. The same methods are applied from 1990 to 2021 in order to ensure time-series consistency. This methodology is consistent with IPCC (2006).

Soil Carbon Stock Changes

The following section includes a brief description of the methodology used to estimate changes in soil organic C stocks for Grassland Remaining Grassland, including: (1) agricultural land use and management activities on mineral soils; and (2) agricultural land use and management activities on organic soils. Further elaboration on the methodologies and data used to estimate stock changes from mineral and organic soils are provided in the Cropland Remaining Cropland section and Annex 3.12 of EPA (2022).

Soil organic C stock changes are estimated for Grassland Remaining Grassland on non-federal lands according to land use histories recorded in the 2015 USDA NRI survey (USDA-NRCS 2018). Land use and some management information (e.g., grass type, soil attributes, and irrigation) were originally collected for each NRI survey location on a 5-year cycle beginning in 1982. In 1998, the NRI program began collecting annual data, and the annual data are currently available through 2017, however this Inventory uses the previous NRI with annual data through 2015 (USDA-NRCS 2015). NRI survey locations are classified as Grassland Remaining Grassland in a given year between 1990 and 2015 if the land use had been grassland for 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an overestimation of Grassland Remaining Grassland in the early part of the time series to the extent that some areas are converted to grassland between 1971 and 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate C stock changes from 1990 to 2015 for most mineral soils in Grassland Remaining Grassland. The C stock changes for the remaining soils are estimated with an IPCC Tier 2 method (Ogle et al. 2003), including gravelly, cobbly, or shaley soils (greater than 35 percent by volume), the additional stock changes associated with biosolids (i.e., treated sewage sludge) amendments, and federal land.⁵²

A surrogate data method is used to estimate soil organic C stock changes from 2016 to 2021 at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 emissions data from the Tier 2 and 3 methods. Surrogate data for these regression models are based on weather data from the PRISM Climate Group (PRISM Climate Group 2018). See Box 6-4 in the Methodology section of Cropland Remaining Cropland for more information about the surrogate data method.

Tier 3 Approach. Mineral soil organic C stocks and stock changes for Grassland Remaining Grassland are estimated using the DayCent biogeochemical⁵³ model (Parton et al. 1998; Del Grosso et al. 2001, 2011), as described in Cropland Remaining Cropland. The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. Historical land-use patterns and irrigation histories are simulated with DayCent based on the 2015 USDA NRI survey (USDA-NRCS 2018).

The amount of manure produced by each livestock type is calculated for managed and unmanaged waste management systems based on methods described in Section 5.2 Manure Management and Annex 3.11. Manure N deposition from grazing animals (i.e., pasture/range/paddock (PRP) manure) is an input to the DayCent model to

6-80 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

⁵² Federal land is not a land use, but rather an ownership designation that is treated as grassland for purposes of these calculations. The specific land use on federal lands is not identified in the NRI survey (USDA-NRCS 2018).

⁵³ Biogeochemical cycles are the flow of chemical elements and compounds between living organisms and the physical environment.

estimate the influence of PRP manure on C stock changes for lands included in the Tier 3 method. Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015 using the NRI survey data. Further elaboration on the Tier 3 methodology and data used to estimate C stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes from 2016 to 2021 are approximated using a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors, described in Box 6-4 of the Methodology section in Cropland Remaining Cropland. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data (see the Planned Improvements section in Cropland Remaining Cropland).

Tier 2 Approach. The Tier 2 approach is based on the same methods described in the Tier 2 portion of Cropland Remaining Cropland section for mineral soils, with the exception of the manure N deposition from grazing animals (i.e., PRP manure), and the land use and management data that are used in the Inventory for federal grasslands. First, the PRP N manure is included in the Tier 2 method that is not deposited on lands included in the Tier 3 method. Second, the NRI (USDA-NRCS 2018) provides land use and management histories for all non-federal lands, and is the basis for the Tier 2 analysis for these areas. However, NRI does not provide land use information on federal lands. The land use data for federal lands is based on the National Land Cover Database (NLCD) (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007; Homer et al. 2015). In addition, the Bureau of Land Management (BLM) manages some of the federal grasslands, and compiles information on grassland condition through the BLM Rangeland Inventory (BLM 2014). To estimate soil organic C stock changes from federal grasslands, rangeland conditions in the BLM data are aligned with IPCC grassland management categories of nominal, moderately degraded, and severely degraded in order to apply the appropriate emission factors. Further elaboration on the Tier 2 methodology and data used to estimate C stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, time series of activity data will be updated in a future Inventory, and emissions from 2016 to 2021 will be recalculated.

Additional Mineral C Stock Change Calculations

A Tier 2 method is used to adjust annual C stock change estimates for mineral soils between 1990 and 2021 to account for additional C stock changes associated with biosolids (i.e., treated sewage sludge) amendments. Estimates of the amounts of biosolids N applied to agricultural land are derived from national data on biosolids generation, disposition, and N content (see Section 7.2, Wastewater Treatment for a detailed discussion of the methodology for estimating treated sewage sludge available for land application application). Although biosolids can be added to land managed for other land uses, it is assumed that agricultural amendments only occur in Grassland Remaining Grassland. Total biosolids generation data for 1988, 1996, and 1998, in dry mass units, are obtained from EPA (1999) and estimates for 2004 are obtained from an independent national biosolids survey (NEBRA 2007). These values are linearly interpolated to estimate values for the intervening years, and linearly extrapolated to estimate values for years since 2004. Nitrogen application rates from Kellogg et al. (2000) are used to determine the amount of area receiving biosolids amendments. The soil organic C storage rate is estimated at 0.38 metric tons C per hectare per year for biosolids amendments to grassland as described above. The stock change rate is based on country-specific factors and the IPCC default method (see Annex 3.12 of EPA (2022) for further discussion).

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 606 of 1050 PageID 4054

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Grassland Remaining Grassland are estimated using the Tier 2 method in IPCC (2006), which utilizes country-specific C loss rates (Ogle et al. 2003) rather than default IPCC rates. For more information, see the Cropland Remaining Cropland section for organic soils and Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series (i.e., 2016 to 2021) are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

Uncertainty

The uncertainty analysis for biomass, dead wood and litter C losses with woodlands is conducted in the same way as the uncertainty assessment for forest ecosystem C flux associated with Forest Land Remaining Forest Land. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006) by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details, see the Uncertainty Analysis in Annex 3.13.

Uncertainty analysis for mineral soil organic C stock changes using the Tier 3 and Tier 2 methodologies are based on a Monte Carlo approach that is described in the Cropland Remaining Cropland section and Annex 3.12 of EPA (2022). The uncertainty for annual C emission estimates from drained organic soils in Grassland Remaining Grassland is estimated using a Monte Carlo approach, which is also described in the Cropland Remaining Cropland section. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo Analysis associated with the surrogate data method.

Uncertainty estimates are presented in Table 6-38 for each subcategory (i.e., soil organic C stocks for mineral and organic soils) and the method applied in the Inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates from the Tier 2 and 3 approaches are combined using the simple error propagation methods provided by the IPCC (2006), i.e., by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities.

The combined uncertainty for soil organic C stocks in Grassland Remaining Grassland ranges from more than 1417 percent below and above the 2021 stock change estimate of 10.0 MMT CO_2 Eq. The large relative uncertainty is mostly due to high levels of uncertainty in the Tier 3 method and variation in soil organic C stock changes that is not explained by the surrogate data method.

Table 6-38: Approach 2 Quantitative Uncertainty Estimates for C Stock Changes Occurring Within Grassland Remaining Grassland (MMT CO₂ Eq. and Percent)

Sauras	2021 Flux Estimate	Uncertainty Range Relative to Flux Estimate ^a				
Source	(MMT CO₂ Eq.)	(MMT	CO₂ Eq.)	(%)		
		Lower	Upper	Lower	Upper	
		Bound	Bound	Bound	Bound	
Woodland Biomass:						
Aboveground live biomass	2.1	1.8	2.3	-12%	11%	

Deleugraund live hiemass	0.2	0.2	0.3	40/	40/
Belowground live biomass	0.3	0.3	0.3	-4%	4%
Dead wood	3.0	2.6	3.4	-13%	14%
Litter	+	+	0.1	-20%	20%
Mineral Soil C Stocks Grassland Remaining					
Grassland, Tier 3 Methodology	1.8	(139.6)	143.2	-7961%	7961%
Mineral Soil C Stocks: Grassland Remaining					
Grassland, Tier 2 Methodology	(0.9)	(10.0)	8.1	-960%	960%
Mineral Soil C Stocks: Grassland Remaining					
Grassland, Tier 2 Methodology (Change in Soil					
C due to Biosolids [i.e., Treated Sewage					
Sludge] Amendments)	(1.7)	(2.5)	(8.0)	-50%	50%
Organic Soil C Stocks: Grassland Remaining					
Grassland, Tier 2 Methodology	5.4	1.2	9.6	-77%	77%
Combined Uncertainty for Flux Associated					
with Carbon Stock Changes Occurring in					
Grassland Remaining Grassland	10.0	(131.7)	151.7	-1417%	1417%
LOOF MATERIAL					

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Uncertainty is also associated with a lack of reporting on biomass, dead wood and litter C stock changes for agroforestry systems. Changes in biomass and dead organic matter C stocks are assumed to be negligible in other grasslands, largely comprised of herbaceous biomass, although there are certainly significant changes at subannual time scales across seasons.

QA/QC and Verification

See the QA/QC and Verification section in Cropland Remaining Cropland.

Recalculations Discussion

Recalculations are associated with updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in woodlands for Grassland Remaining Grassland, and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result of these new data, Grassland Remaining Grassland has a larger loss of at 2.2 MMT CO₂ Eq. compared to the previous Inventory, or 28 percent on average over the time series for Grassland Remaining Grassland compared to the previous Inventory.

Planned Improvements

There are two key improvements planned for the Inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for grassland. While both improvements are needed, the latter improvement is a significant development that will resolve the majority of the discrepancy between the managed land base for Grassland Remaining Grassland and amount of area currently included in Grassland Remaining Grassland Inventory (see Table 6-39).

Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.
 Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-39: Comparison of Managed Land Area in Grassland Remaining Grassland and the Area in the current Grassland Remaining Grassland Inventory (Thousand Hectares)

	Area (1	Thousand Hecta	res)
Year	Managed Land	Inventory	Difference
1990	328,320	277,406	50,914
1991	327,812	276,918	50,894
1992	327,355	276,422	50,933
1993	325,620	274,484	51,137
1994	324,006	272,813	51,194
1995	323,134	271,975	51,159
1996	322,284	271,123	51,160
1997	321,526	270,259	51,268
1998	319,596	268,174	51,422
1999	318,701	267,301	51,400
2000	317,690	266,202	51,488
2001	316,849	265,649	51,200
2002	316,455	265,192	51,263
2003	316,780	265,403	51,377
2004	316,810	265,421	51,389
2005	316,625	265,123	51,502
2006	316,344	264,804	51,540
2007	316,326	264,749	51,577
2008	316,496	264,878	51,618
2009	316,792	265,099	51,693
2010	316,652	264,942	51,711
2011	316,403	264,627	51,776
2012	316,294	264,413	51,881
2013	317,153	265,239	51,914
2014	318,024	266,180	51,844
2015	318,146	266,234	51,912
2016	318,513	*	*
2017	318,704	*	*
2018	321,748	*	*
2019	322,632	*	*
2020	323,883	*	*
2021	325,096	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

Additionally, a review of available data on biosolids (i.e., treated sewage sludge) application will be undertaken to improve the distribution of biosolids application on croplands, grasslands and settlements. For information about other improvements, see the Planned Improvements section in Cropland Remaining Cropland.

Non-CO₂ Emissions from Grassland Fires (CRF Source Category 4C1)

Fires are common in grasslands, and are thought to have been a key feature shaping the evolution of the grassland vegetation in North America (Daubenmire 1968; Anderson 2004). Fires can occur naturally through lightning

strikes, but are also an important management practice to remove standing dead vegetation and improve forage for grazing livestock. Woody and herbaceous biomass will be oxidized in a fire, although in this section the current focus is primarily on herbaceous biomass.⁵⁴ Biomass burning emits a variety of trace gases including non-CO₂ greenhouse gases such as CH₄ and N₂O, as well as CO and NO_x that can become greenhouse gases when they react with other gases in the atmosphere (Andreae and Merlet 2001). IPCC (2006) recommends reporting non-CO2 greenhouse gas emissions from all wildfires and prescribed burning occurring in managed grasslands.

Biomass burning in grassland of the United States (Including burning emissions in Grassland Remaining Grassland and Land Converted to Grassland) is a relatively small source of emissions, but it has increased by over 300 percent since 1990. In 2021, CH₄ and N₂O emissions from biomass burning in grasslands were 0.3 MMT CO₂ Eq. (12 kt) and 0.3 MMT CO₂ Eq. (1 kt), respectively. Annual emissions from 1990 to 2021 have averaged approximately 0.3 MMT CO₂ Eq. (12 kt) of CH₄ and 0.3 MMT CO₂ Eq. (1 kt) of N₂O (see Table 6-40 and Table 6-41).

Table 6-40: CH₄ and N₂O Emissions from Biomass Burning in Grassland (MMT CO₂ Eq.)

	1990	2005	2017	2018	2019	2020	2021
CH ₄	0.1	0.4	0.3	0.3	0.3	0.3	0.3
N_2O	0.1	0.3	0.3	0.3	0.3	0.3	0.3
Total Net Flux	0.2	0.7	0.6	0.6	0.6	0.6	0.6

Table 6-41: CH₄, N₂O, CO, and NO_x Emissions from Biomass Burning in Grassland (kt)

	1990	2005	2017	2018	2019	2020	2021
CH ₄	3	13	12	12	12	12	12
N_2O	+	1	1	1	1	1	1
CO	84	358	345	331	341	334	339
NO_x	5	21	21	20	20	20	20

⁺ Does not exceed 0.5 kt.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate non-CO2 greenhouse gas emissions from biomass burning in grassland, including (1) determination of the land base that is classified as managed grassland; (2) assessment of managed grassland area that is burned each year, and (3) estimation of emissions resulting from the fires. For this Inventory, the IPCC Tier 1 method is applied to estimate non-CO2 greenhouse gas emissions from biomass burning in grassland from 1990 to 2014 (IPCC 2006). A data splicing method is used to estimate the emissions from 2015 to 2021, which is discussed later in this section.

The land area designated as managed grassland is based primarily on the National Resources Inventory (NRI) (Nusser and Goebel 1997; USDA-NRCS 2015). NRI has survey locations across the entire United States, but does not classify land use on federally-owned areas, and so survey locations on federal lands are designated as grassland using land cover data from the National Land Cover Dataset (NLCD) (Fry et al. 2011; Homer et al. 2007; Homer et al. 2015) (see Section 6.1 Representation of the U.S. Land Base).

The area of biomass burning in grasslands (Grassland Remaining Grassland and Land Converted to Grassland) is determined using 30-m fire data from the Monitoring Trends in Burn Severity (MTBS) program for 1990 through

 $^{^{54}}$ A planned improvement is underway to incorporate woodland tree biomass into the Inventory for non-CO $_2$ emissions from grassland fires.

2014.⁵⁵ NRI survey locations on grasslands are designated as burned in a year if there is a fire within 500 m of the survey point according to the MTBS fire data. The area of biomass burning is estimated from the NRI spatial weights and aggregated to the country (Table 6-42).

Table 6-42: Thousands of Grassland Hectares Burned Annually

Year	Thousand Hectares
1990	317
2005	1,343
2017	NE
2018	NE
2019	NE
2020	NE
2021	NE

Notes: Burned area was not estimated (NE) for 2015 to 2021 but will be updated in a future Inventory. Burned area for the year 2014 is estimated to be 1,659 thousand hectares.

For 1990 to 2014, the total area of grassland burned is multiplied by the IPCC default factor for grassland biomass (4.1 tonnes dry matter per ha) (IPCC 2006) to estimate the amount of combusted biomass. A combustion factor of 1 is assumed in this Inventory, and the resulting biomass estimate is multiplied by the IPCC default grassland emission factors for CH₄ (2.3 g CH₄ per kg dry matter), N₂O (0.21 g N₂O per kg dry matter), CO (65 g CO per kg dry matter) and NO_x (3.9 g NO_x per kg dry matter) (IPCC 2006). The Tier 1 analysis is implemented in the Agriculture and Land Use National Greenhouse Gas Inventory (ALU) software (Ogle et al. 2016). 56

A linear extrapolation of the trend in the time series is applied to estimate emissions for 2015 to 2021. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to derive the trend in emissions over time from 1990 to 2014, and the trend is used to approximate the 2015 to 2021 emissions. The Tier 1 method described previously will be applied to recalculate the 2015 to 2021 emissions in a future Inventory.

The same methods are applied from 1990 to 2014, and a data splicing method is used to extend the time series from 2015 to 2021 ensuring a consistent time series of emissions data. The trend extrapolation is a standard data splicing method for estimating emissions at the end of a time series if activity data are not available (IPCC 2006).

Uncertainty

Emissions are estimated using a linear regression model with ARMA errors for 2015 to 2021. The model produces estimates for the upper and lower bounds of the emission estimate and the results are summarized in Table 6-43. Methane emissions from Biomass Burning in Grassland for 2021 are estimated to be between approximately 0.0 and 0.8 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 100 percent below and 138 percent above the 2021 emission estimate of 0.3 MMT CO_2 Eq. Nitrous oxide emissions are estimated to be between approximately 0.0 and 0.7 MMT CO_2 Eq., or 100 percent below and 143 percent above the 2021 emission estimate of 0.3 MMT CO_2 Eq.

⁵⁵ See http://www.mtbs.gov.

⁵⁶ See http://www.nrel.colostate.edu/projects/ALUsoftware/.

Table 6-43: Uncertainty Estimates for Non-CO₂ Greenhouse Gas Emissions from Biomass Burning in Grassland (MMT CO₂ Eq. and Percent)

		2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate						
Source	Gas	(MMT CO₂ Eq.)	(MMT	CO ₂ Eq.)	(9	%)			
Source	Gas		Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Grassland Burning	CH ₄	0.3	+	0.8	-100%	+145%			
Grassland Burning	N_2O	0.3	+	0.7	-100%	+145%			

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Uncertainty is also associated with lack of reporting of emissions from biomass burning in grassland of Alaska. Grassland burning emissions could be relatively large in this region of the United States, and therefore extending this analysis to include Alaska is a planned improvement for the Inventory. There is also uncertainty due to lack of reporting combustion of woody biomass, and this is another planned improvement.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. Quality control identified problems with input data for common reporting format tables in the spreadsheets, which have been corrected.

Recalculations Discussion

EPA updated global warming potentials (GWP) for calculating the CO_2 -equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. As a result of this change, there was a net decrease in calculated CO_2 -equivalent emissions by an annual average of less than 0.05 MMT CO_2 Eq., or 0.03 percent, over the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

A data splicing method is applied to estimate emissions in the latter part of the time series, which introduces additional uncertainty in the emissions data. Therefore, a key improvement for the next Inventory will be to update the time series with new activity data from the Monitoring Trends in Burn Severity program and recalculate the emissions. Two other planned improvements have been identified for this source category, including a) incorporation of country-specific grassland biomass factors, and b) extending the analysis to include Alaska. In the current Inventory, biomass factors are based on a global default for grasslands that is provided by the IPCC (2006). There is considerable variation in grassland biomass, however, which would affect the amount of fuel available for combustion in a fire. Alaska has an extensive area of grassland and includes tundra vegetation, although some of the areas are not managed. There has been an increase in fire frequency in boreal forest of the region (Chapin et al. 2008), and this may have led to an increase in burning of neighboring grassland areas. There is also an effort under development to incorporate grassland fires into DayCent model simulations. Lastly, a future Inventory will incorporate non-CO₂ greenhouse emissions from burning woodland tree biomass in grasslands. These

^a Range of emission estimates predicted by linear regression time-series model for a 95 percent confidence interval.

improvements are expected to reduce uncertainty and produce more accurate estimates of non-CO₂ greenhouse gas emissions from grassland burning.

6.7 Land Converted to Grassland (CRF Category 4C2)

Land Converted to Grassland includes all grassland in an Inventory year that had been in another land use(s) during the previous 20 years (USDA-NRCS 2018).⁵⁷ For example, cropland or forest land converted to grassland during the past 20 years would be reported in this category. Recently converted lands are retained in this category for 20 years as recommended by IPCC (2006). Grassland includes pasture and rangeland that are used primarily but not exclusively for livestock grazing. Rangelands are typically extensive areas of native grassland that are not intensively managed, while pastures are typically seeded grassland (possibly following tree removal) that may also have additional management, such as irrigation or interseeding of legumes.

Land use change can lead to large losses of C to the atmosphere, particularly conversions from forest land (Houghton et al. 1983, Houghton and Nassikas 2017). Moreover, conversion of forest to another land use (i.e., deforestation) is one of the largest anthropogenic sources of emissions to the atmosphere globally, although this source may be declining according to a recent assessment (Tubiello et al. 2015).

IPCC (2006) recommends reporting changes in biomass, dead organic matter, and soil organic C stocks due to landuse change. All soil organic C stock changes are estimated and reported for Land Converted to Grassland, but there is limited reporting of other pools in this Inventory. Losses of aboveground and belowground biomass, dead wood and litter C from Forest Land Converted to Grassland are reported, as well as gains and losses associated with conversions to woodlands⁵⁸ from other land uses, including Croplands Converted to Grasslands, Settlements Converted to Grasslands and Other Lands Converted to Grasslands. However, the current Inventory does not include the gains and losses in aboveground and belowground biomass, dead wood and litter C for other land-use conversions to grassland that are not woodlands.⁵⁹

There are two discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Land Converted to Grassland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not yet been incorporated into the Land Converted to Grassland Inventory. Second, grassland in Alaska is not included in the Inventory. These differences lead to discrepancies between the managed area in Land Converted to Grassland and the grassland area included in the Land Converted to Grassland Inventory analysis (Table 6-47). Improvements are underway to incorporate the latest NRI dataset, and grasslands in Alaska as part of future C inventories (See Planned Improvements Section).

6-88 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021

⁵⁷ NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 2001. This may have led to an underestimation of Land Converted to Grassland in the early part of the time series to the extent that some areas are converted to grassland between 1971 and 1978.

⁵⁸ Woodlands are considered grasslands in the U.S. Land Representation because they do not meet the definition of Forest Land.

⁵⁹ Changes in biomass C stocks are not currently reported for other conversions to grassland (other than forest land conversion to grassland and other land -use conversions to woodlands), but this is a planned improvement for a future Inventory. Note: changes in dead organic matter are assumed negligible for other land-use conversions (i.e., other than forest land) to grassland based on the Tier 1 method in IPCC (2006).

The largest C losses with Land Converted to Grassland are associated with aboveground biomass, belowground biomass, and litter C losses from Forest Land Converted to Grassland (see Table 6-44 and Table 6-45). These three pools led to net emissions in 2021 of 12.6, 2.2, and 4.8 MMT CO₂ Eq. (3.4, 0.6, and 1.3 MMT C), respectively. In contrast, land use and management of mineral soils in Land Converted to Grassland led to an increase in soil organic C stocks, estimated at 42.6 MMT CO₂ Eq. (11.6 MMT C) in 2021. The gains are primarily associated with Other Land Converted to Grassland, and also due to Cropland Converted to Grassland, which leads to less intensive management of the soil. Drainage of organic soils for grassland management led to CO2 emissions to the atmosphere of 1.8 MMT CO₂ Eq. (0.5 MMT C). The total net C stock change in 2021 for Land Converted to Grassland is estimated as a gain of 24.7 MMT CO₂ Eq. (6.7 MMT C), which represents an increase in C stock change of 269 percent compared to the initial reporting year of 1990.

Table 6-44: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Grassland (MMT CO₂ Eq.)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Grassland	(19.1)	(24.2)	(18.6)	(18.5)	(18.0)	(20.3)	(19.3)
Aboveground Live Biomass	(0.4)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Belowground Live Biomass	(0.1)	(0.1)	+	+	+	+	+
Dead Wood	(0.2)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.2)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Mineral Soils	(18.9)	(25.0)	(19.4)	(19.3)	(18.7)	(21.0)	(20.1)
Organic Soils	0.6	1.5	1.4	1.3	1.3	1.3	1.3
Forest Land Converted to Grassland	20.1	20.2	19.7	19.7	19.6	19.6	19.6
Aboveground Live Biomass	13.3	13.1	12.6	12.6	12.6	12.6	12.6
Belowground Live Biomass	2.3	2.3	2.2	2.2	2.2	2.2	2.2
Dead Wood	(0.3)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	4.8	4.9	4.8	4.8	4.8	4.8	4.8
Mineral Soils	(0.1)	(0.1)	+	+	(0.1)	+	+
Organic Soils	+	0.2	0.2	0.2	0.2	0.2	0.2
Other Lands Converted to Grassland	(7.2)	(34.5)	(24.6)	(24.4)	(24.0)	(24.3)	(24.0)
Aboveground Live Biomass	(1.6)	(1.5)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Belowground Live Biomass	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Dead Wood	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Litter	(0.8)	(0.8)	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)
Mineral Soils	(4.2)	(31.7)	(22.2)	(21.9)	(21.6)	(21.9)	(21.6)
Organic Soils	+	+	0.1	0.1	0.1	0.1	0.1
Settlements Converted to Grassland	(0.6)	(1.7)	(1.3)	(1.2)	(1.2)	(1.3)	(1.2)
Aboveground Live Biomass	(0.2)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Mineral Soils	(0.2)	(1.4)	(1.0)	(0.9)	(0.9)	(1.0)	(0.9)
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to Grassland	0.1	0.2	0.3	0.3	0.3	0.2	0.2
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Aboveground Live Biomass	11.1	11.1	11.0	11.0	10.9	10.9	10.9
Belowground Live Biomass	2.1	2.0	2.0	2.0	2.0	2.0	2.0
Dead Wood	(0.9)	(0.8)	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)
Litter	3.7	3.8	3.9	3.9	3.9	3.9	3.9
Total Mineral Soil Flux	(23.4)	(58.2)	(42.5)	(42.2)	(41.3)	(43.9)	(42.6)
Total Organic Soil Flux	0.8	1.9	1.9	1.9	1.8	1.8	1.8
Total Net Flux	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
L Doos not exceed 0.05 MMT CO. Fa	1- /		1 -1	. ,	/	/	

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-45: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Grassland (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Grassland	(5.2)	(6.6)	(5.1)	(5.1)	(4.9)	(5.5)	(5.3)
Aboveground Live Biomass	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	+	+	+	+	+	+	+
Litter	(0.1)	+	+	+	+	+	+
Mineral Soils	(5.2)	(6.8)	(5.3)	(5.3)	(5.1)	(5.7)	(5.5)
Organic Soils	0.2	0.4	0.4	0.4	0.4	0.4	0.4
Forest Land Converted to Grassland	5.5	5.5	5.4	5.4	5.4	5.4	5.4
Aboveground Live Biomass	3.6	3.6	3.4	3.4	3.4	3.4	3.4
Belowground Live Biomass	0.6	0.6	0.6	0.6	0.6	0.6	0.6
Dead Wood	(0.1)	(0.1)	+	+	+	+	+
Litter	1.3	1.3	1.3	1.3	1.3	1.3	1.3
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	+	0.1	0.1	0.1	0.1	0.1
Other Lands Converted to Grassland	(2.0)	(9.4)	(6.7)	(6.6)	(6.5)	(6.6)	(6.5)
Aboveground Live Biomass	(0.4)	(0.4)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Belowground Live Biomass	(0.1)	+	+	+	+	+	+
Dead Wood	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Mineral Soils	(1.2)	(8.6)	(6.1)	(6.0)	(5.9)	(6.0)	(5.9)
Organic Soils	+	+	+	+	+	+	+
Settlements Converted to Grassland	(0.2)	(0.5)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Aboveground Live Biomass	+	+	+	+	+	+	+
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	+	+	+	+	+	+	+
Litter	+	+	+	+	+	+	+
Mineral Soils	+	(0.4)	(0.3)	(0.3)	(0.2)	(0.3)	(0.3)
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to Grassland	+	0.1	0.1	0.1	0.1	0.1	0.1
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Aboveground Live Biomass	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Belowground Live Biomass	0.6	0.6	0.5	0.5	0.5	0.5	0.5
Dead Wood	(0.3)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Litter	1.0	1.0	1.1	1.1	1.1	1.1	1.1
Total Mineral Soil Flux	(6.4)	(15.9)	(11.6)	(11.5)	(11.3)	(12.0)	(11.6)
Total Organic Soil Flux	0.2	0.5	0.5	0.5	0.5	0.5	0.5
Total Net Flux	(1.8)	(10.9)	(6.7)	(6.6)	(6.4)	(7.1)	(6.7)
. December assessed 0.0F NANAT C	` '	_ ` _ ′		<u> </u>			<u> </u>

⁺ Does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Land Converted to Grassland, including (1) loss of aboveground and belowground biomass, dead wood and litter C with Forest Land Converted to Grassland and other land-use conversions to woodlands, as well as (2) the impact from all land-use conversions to grassland on mineral and organic soil organic C stocks.

Biomass, Dead Wood, and Litter Carbon Stock Changes

A Tier 3 method is applied to estimate biomass, dead wood and litter C stock changes for Forest Land Converted to Grassland and other land-use conversions to woodlands (i.e., Croplands Converted to Grasslands, Settlements Converted to Grasslands and Other Lands Converted to Grasslands). Estimates are calculated in the same way as those in the Forest Land Remaining Forest Land category using data from the USDA Forest Service, Forest Inventory and Analysis (FIA) program (USDA Forest Service 2022). There are limited data on the herbaceous grassland C stocks following conversion so default biomass estimates (IPCC 2006) for grasslands are used to estimate C stock changes (Note: litter and dead wood C stocks are assumed to be zero following conversion because no reference C density estimates exist for grasslands). The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion.

The amount of biomass C that is lost abruptly with Forest Land Converted to Grasslands is estimated based on the amount of C before conversion and the amount of C following conversion according to remeasurements in the FIA program. This approach is consistent with IPCC (2006) that assumes there is an abrupt change during the first year, but does not necessarily capture the slower change over the years following conversion until a new steady state is reached. It was determined that using an IPCC Tier I approach that assumes all C is lost in the year of conversion for Forest Land Converted to Grasslands in the West and Great Plains states does not accurately characterize the transfer of C in woody biomass during abrupt or gradual land-use change. To estimate this transfer of C in woody biomass, state-specific C densities for woody biomass remaining on these former forest lands following conversion to grasslands were developed and included in the estimation of C stock changes from Forest Land Converted to Grasslands in the West and Great Plains states. A review of the literature in grassland and rangeland ecosystems (Asner et al. 2003; Huang et al. 2009; Tarhouni et al. 2016), as well as an analysis of FIA data, suggests that a conservative estimate of 50 percent of the woody biomass C density was lost during conversion from Forest Land to Grasslands. This estimate was used to develop state-specific C density estimates for biomass, dead wood, and litter for Grasslands in the West and Great Plains states and these state-specific C densities were applied in the compilation system to estimate the C losses associated with conversion from forest land to grassland in the West and Great Plains states. Further, losses from forest land to what are characterized as woodlands are included in this category using FIA plot re-measurements and the methods and models described hereafter.

If FIA plots include data on individual trees, aboveground and belowground C density estimates are based on Woodall et al. (2011). Aboveground and belowground biomass estimates also include live understory which is a minor component of biomass defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density are based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003).

If FIA plots include data on standing dead trees, standing dead tree C density is estimated following the basic method applied to live trees (Woodall et al. 2011) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). If FIA plots include data on downed dead wood, downed dead wood C density is estimated based on measurements of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter that are not attached to live or standing dead trees at transect intersection. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots is measured for litter C. If FIA plots include litter material, a modeling approach using litter C measurements from FIA plots is used to estimate litter C density (Domke et al. 2016). The same methods are applied from 1990 to 2021 in order to ensure time-series consistency. See Annex 3.13 for more information about reference C density estimates for forest land. See the Grassland Remaining Grassland section for more information about estimation of biomass, deadwood and litter C stock changes for woodlands.

Soil Carbon Stock Changes

Soil organic C stock changes are estimated for Land Converted to Grassland according to land use histories recorded in the 2015 USDA NRI survey for non-federal lands (USDA-NRCS 2018). Land use and some management information (e.g., crop type, soil attributes, and irrigation) were originally collected for each NRI survey locations on a 5-year cycle beginning in 1982. In 1998, the NRI Program began collecting annual data, and the annual data are currently available through 2017, however this Inventory uses the previous NRI with annual data through 2015 (USDA-NRCS 2018). NRI survey locations are classified as Land Converted to Grassland in a given year between 1990 and 2015 if the land use is grassland but had been classified as another use during the previous 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an underestimation of Land Converted to Grassland in the early part of the time series to the extent that some areas are converted to grassland between 1971 and 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate C stock changes in mineral soils for most of the area in Land Converted to Grassland. C stock changes on the remaining area are estimated with an IPCC Tier 2 approach (Ogle et al. 2003), including prior cropland used to produce vegetables, tobacco, and perennial/horticultural crops; land areas with very gravelly, cobbly, or shaley soils (greater than 35 percent by volume); and land converted to grassland from another land use other than cropland.

A surrogate data method is used to estimate soil organic C stock changes from 2016 to 2021 at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 emissions data that are derived using the Tier 2 and 3 methods. Surrogate data for these regression models includes weather data from the PRISM Climate Group (PRISM Climate Group 2018). See Box 6-4 in the Methodology section of Cropland Remaining Cropland for more information about the surrogate data method.

Tier 3 Approach. Mineral soil organic C stocks and stock changes are estimated using the DayCent biogeochemical model (Parton et al. 1998; Del Grosso et al. 2001, 2011). The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. Historical land use patterns and irrigation histories are simulated with DayCent based on the 2015 USDA NRI survey (USDA-NRCS 2018). Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015. See the Cropland Remaining Cropland section and Annex 3.12 for additional discussion of the Tier 3 methodology for mineral soils.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes from 2016 to 2021 are approximated using a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors, described in 0 of the Methodology section in Cropland Remaining Cropland. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data (see the Planned Improvements section in Cropland Remaining Cropland).

Tier 2 Approach. For the mineral soils not included in the Tier 3 analysis, soil organic C stock changes are estimated using a Tier 2 Approach, as described in the Tier 2 Approach for mineral soils in Grassland Remaining Grassland and

6-92 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

⁶⁰ Biogeochemical cycles are the flow of chemical elements and compounds between living organisms and the physical environment.

Annex 3.12. In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Land Converted to Grassland are estimated using the Tier 2 method provided in IPCC (2006), with country-specific Closs rates (Ogle et al. 2003) as described in the Cropland Remaining Cropland section. Further elaboration on the methodology is also provided in Annex 3.12 for organic

In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Annual C emissions from drained organic soils from 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

Uncertainty

The uncertainty analyses for biomass, dead wood and litter C losses with Forest Land Converted to Grassland and other land-use conversions to woodlands are conducted in the same way as the uncertainty assessment for forest ecosystem C flux in the Forest Land Remaining Forest Land category. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006), by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details see the Uncertainty Analysis in Annex 3.13.

The uncertainty analyses for mineral soil organic C stock changes using the Tier 3 and Tier 2 methodologies are based on a Monte Carlo approach that is described in the Cropland Remaining Cropland section and Annex 3.12. The uncertainty for annual C emission estimates from drained organic soils in Land Converted to Grassland is estimated using a Monte Carlo approach, which is also described in the Cropland Remaining Cropland section. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo Analysis associated with a surrogate data method, which is also described in Cropland Remaining Cropland.

Uncertainty estimates are presented in Table 6-46 for each subsource (i.e., biomass C stocks, mineral and organic C stocks in soils) and the method applied in the inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates from the Tier 2 and 3 approaches are combined using the simple error propagation methods provided by the IPCC (2006), as discussed in the previous paragraph. The combined uncertainty for total C stocks in Land Converted to Grassland ranges from 149 percent below to 149 percent above the 2021 stock change estimate of 24.7 MMT CO2 Eq. The large relative uncertainty around the 2021 stock change estimate is partly due to large uncertainties in biomass and dead organic matter C losses with Forest Land Conversion to Grassland, in addition to variation in soil organic C stock changes that is not explained by the surrogate data method.

Table 6-46: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Grassland (MMT CO₂ Eq. and Percent)

Source	2021 Flux Estimate ^a		nty Range Rela		
	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(9	%)
		Lower	Upper	Lower	Upper
		Bound	Bound	Bound	Bound
Cropland Converted to Grassland	(19.3)	(48.9)	10.3	-153%	153%
Aboveground Live Biomass	(0.3)	(0.6)	0.1	-129%	129%
Belowground Live Biomass	+	(0.1)	+	-167%	100%
Dead Wood	(0.1)	(0.3)	+	-133%	129%
Litter	(0.1)	(0.3)	+	-114%	127%
Mineral Soil C Stocks: Tier 3	(16.2)	(45.6)	13.1	-181%	181%
Mineral Soil C Stocks: Tier 2	(3.8)	(7.2)	(0.5)	-88%	88%
Organic Soil C Stocks: Tier 2	1.3	(0.1)	2.7	-105%	105%
Forest Land Converted to Grassland	19.6	5.4	33.9	-73%	73%
Aboveground Live Biomass	12.6	(0.6)	25.7	-104%	104%
Belowground Live Biomass	2.2	(0.1)	4.5	-105%	105%
Dead Wood	(0.1)	+	+	-100%	117%
Litter	4.8	(0.2)	9.9	-105%	104%
Mineral Soil C Stocks: Tier 2	+	(0.2)	0.1	-324%	324%
Organic Soil C Stocks: Tier 2	0.2	+	0.4	-119%	119%
Other Lands Converted to Grassland	(24.0)	(40.5)	(7.5)	-69%	69%
Aboveground Live Biomass	(1.3)	(2.1)	(0.5)	-63%	62%
Belowground Live Biomass	(0.2)	(0.3)	(0.1)	-68%	52%
Dead Wood	(0.4)	(0.6)	(0.1)	-66%	61%
Litter	(0.7)	(1.1)	(0.3)	-62%	63%
Mineral Soil C Stocks: Tier 2	(21.6)	(38.0)	(5.1)	-76%	76%
Organic Soil C Stocks: Tier 2	0.1	+	0.2	-163%	163%
Settlements Converted to Grassland	(1.2)	(2.0)	(0.5)	-61%	62%
Aboveground Live Biomass	(0.1)	(0.2)	+	-61%	73%
Belowground Live Biomass	+	+	+	-108%	100%
Dead Wood	(0.1)	(0.1)	+	-42%	29%
Litter	(0.1)	(0.1)	+	-46%	63%
Mineral Soil C Stocks: Tier 2	(0.9)	(1.7)	(0.2)	-80%	80%
Organic Soil C Stocks: Tier 2	+	+	+	-289%	289%
Wetlands Converted to Grasslands	0.2	+	0.5	-120%	120%
Mineral Soil C Stocks: Tier 2	+	(0.1)	0.1	-933%	933%
Organic Soil C Stocks: Tier 2	0.2	+	0.5	-119%	119%
Total: Land Converted to Grassland	(24.7)	(61.4)	12.1	-149%	149%
Aboveground Live Biomass	10.9	(2.2)	24.1	-120%	120%
Belowground Live Biomass	2.0	(0.3)	4.3	-116%	116%
Dead Wood	(0.7)	(1.0)	(0.4)	-48%	47%
Litter	3.9	(1.2)	9.0	-130%	130%
Mineral Soil C Stocks: Tier 3	(16.2)	(45.6)	13.1	-181%	181%
Mineral Soil C Stocks: Tier 2	(26.4)	(43.2)	(9.6)	-64%	64%
Organic Soil C Stocks: Tier 2	1.8	0.4	3.2	-04 <i>%</i> -79%	79%

⁺ Absolute value does not exceed 0.05 MMT CO_2 Eq.

Uncertainty is also associated with a lack of reporting on biomass, dead wood and litter C stock changes for conversions to agroforestry systems and herbaceous grasslands. The influence of agroforestry is difficult to address because there are currently no datasets to evaluate the trends in the area and associated C stocks in agroforestry

^a Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval. Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

systems. The influence of land-use change to herbaceous grasslands and agroforestry will be further explored in a future Inventory.

QA/QC and Verification

See the QA/QC and Verification section in Cropland Remaining Cropland and Grassland Remaining Grassland for information on QA/QC steps.

Recalculations Discussion

Recalculations are associated with new FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks associated with conversions to woodlands from Cropland Converted to Grassland, Other Land Converted to Grassland, and Settlements Converted to Grassland; updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks from Forest Land Converted to Grassland; and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Grassland has an estimated increase in C stock changes of 2.9 MMT CO₂ Eq. on average over the time series, representing a 23 percent increase in C sequestration compared to the previous Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for cropland. These two improvements will resolve the majority of the discrepancy between the managed land base for Land Converted to Grassland and amount of area currently included in Land Converted to Grassland Inventory (See Table 6.47).

Table 6-47: Comparison of Managed Land Area in Land Converted to Grassland and Area in the current Land Converted to Grassland Inventory (Thousand Hectares)

	Area (1	Thousand Hecta	res)
Year	Managed Land	Inventory	Difference
1990	9,319	9,394	-75
1991	9,514	9,485	29
1992	9,733	9,691	43
1993	11,641	11,566	75
1994	13,391	13,378	14
1995	14,060	13,994	66
1996	14,749	14,622	127
1997	15,431	15,162	269
1998	19,309	19,052	258
1999	20,164	19,931	234
2000	21,295	20,859	436
2001	22,387	21,968	418
2002	22,863	22,392	471
2003	22,495	22,008	487
2004	23,164	22,547	617
2005	23,070	22,447	622
2006	23,409	22,702	707
2007	23,144	22,428	716

2008	23,448	22,661	787	
2009	23,339	22,581	758	
2010	23,415	22,634	780	
2011	23,557	22,750	806	
2012	23,383	22,596	787	
2013	22,196	21,439	757	
2014	20,856	20,163	693	
2015	20,811	20,210	601	
2016	20,083	*	*	
2017	19,349	*	*	
2018	16,517	*	*	
2019	16,090	*	*	
2020	15,254	*	*	
2021	13,892	*	*	

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

In addition, the amount of biomass C that is lost abruptly or the slower changes that continue to occur over a decade or longer with Forest Land Converted to Grasslands will be further refined in a future Inventory. The current values are estimated based on the amount of C before conversion and an estimated level of C left after conversion based on limited plot data from the FIA and published literature for the Western United States and Great Plains Regions. The amount of C left after conversion will be further investigated with additional data collection, particularly in the Western United States and Great Plains, including tree biomass, understory biomass, dead wood and litter C pools. In addition, biomass C stock changes will be estimated for conversions from other land uses to herbaceous grasslands. For information about other improvements, see the Planned Improvements section in Cropland Remaining Cropland.

6.8 Wetlands Remaining Wetlands (CRF Category 4D1)

Wetlands Remaining Wetlands includes all wetlands in an Inventory year that have been classified as a wetland for the previous 20 years, and in this Inventory, the flux estimates include Peatlands, Coastal Wetlands, and Flooded Land.

Peatlands Remaining Peatlands

Emissions from Managed Peatlands

Managed peatlands are peatlands that have been cleared and drained for the production of peat. The production cycle of a managed peatland has three phases: land conversion in preparation for peat extraction (e.g., clearing surface biomass, draining), extraction (which results in the emissions reported under Peatlands Remaining Peatlands), and abandonment, restoration, rewetting, or conversion of the land to another use.

Carbon dioxide emissions from the removal of biomass and the decay of drained peat constitute the major greenhouse gas flux from managed peatlands. Managed peatlands may also emit CH_4 and N_2O . The natural production of CH_4 is largely reduced but not entirely eliminated when peatlands are drained in preparation for

peat extraction (Strack et al. 2004 as cited in the 2006 IPCC Guidelines). Drained land surface and ditch networks contribute to the CH₄ flux in peatlands managed for peat extraction. Methane emissions were considered insignificant under the IPCC Tier 1 methodology (IPCC 2006), but are included in the emissions estimates for Peatlands Remaining Peatlands consistent with the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands (IPCC 2013). Nitrous oxide emissions from managed peatlands depend on site fertility. In addition, abandoned and restored peatlands continue to release greenhouse gas emissions. Although methodologies are provided to estimate emissions and removals from rewetted organic soils (which includes rewetted/restored peatlands) in IPCC (2013) guidelines, information on the areal extent of rewetted/restored peatlands in the United States is currently unavailable. The current Inventory estimates CO₂, CH₄ and N₂O emissions from peatlands managed for peat extraction in accordance with IPCC (2006 and 2013) guidelines.

CO₂, N₂O, and CH₄ Emissions from Peatlands Remaining Peatlands

IPCC (2013) recommends reporting CO₂, N₂O, and CH₄ emissions from lands undergoing active peat extraction (i.e., Peatlands Remaining Peatlands) as part of the estimate for emissions from managed wetlands. Peatlands occur where plant biomass has sunk to the bottom of water bodies and water-logged areas and exhausted the oxygen supply below the water surface during the course of decay. Due to these anaerobic conditions, much of the plant matter does not decompose but instead forms layers of peat over decades and centuries. In the United States, peat is extracted for horticulture and landscaping growing media, and for a wide variety of industrial, personal care, and other products. It has not been used for fuel in the United States for many decades. Peat is harvested from two types of peat deposits in the United States: Sphagnum bogs in northern states (e.g., Minnesota) and wetlands in states further south (e.g., Florida). The peat from Sphagnum bogs in northern states, which is nutrientpoor, is generally corrected for acidity and mixed with fertilizer. Production from more southerly states is relatively coarse (i.e., fibrous) but nutrient-rich.

IPCC (2006 and 2013) recommend considering both on-site and off-site emissions when estimating CO₂ emissions from Peatlands Remaining Peatlands using the Tier 1 approach. Current IPCC methodologies estimate only on-site N₂O and CH₄ emissions. This is because off-site N₂O estimates are complicated by the risk of double-counting emissions from nitrogen fertilizers added to horticultural peat where subsequent runoff or leaching into waterbodies can result in indirect N₂O emissions that are already included within the Agricultural Soil Management category.

On-site emissions from managed peatlands occur as the land is drained and cleared of vegetation, and the underlying peat is exposed to sun, weather and oxygen. As this occurs, some peat deposit is lost and CO2 is emitted from the oxidation of the peat. Since N₂O emissions from saturated ecosystems tend to be low unless there is an exogenous source of nitrogen, N₂O emissions from drained peatlands are dependent on nitrogen mineralization and therefore on soil fertility. Peatlands located on highly fertile/nutrient-rich soils, mostly made up of southern peatlands in Florida, contain significant amounts of organic nitrogen in inert/microbially inaccessible forms. Draining land in preparation for peat extraction allows bacteria to convert the organic nitrogen into nitrates through nitrogen mineralization which leach to the surface where they are reduced to N₂O during nitrification. Nitrate availability also contributes to the activity of methanogens and methanotrophs that result in CH₄ emissions (Blodau 2002; Treat et al. 2007 as cited in IPCC 2013). Drainage ditches, which are constructed to drain the land in preparation for peat extraction, also contribute to the flux of CH₄ through in situ production and lateral transfer of CH₄ from the organic soil matrix (IPCC 2013).

Off-site CO₂ emissions from managed peatlands occur from waterborne dissolved organic carbon losses and the horticultural and landscaping use of peat. Dissolved organic carbon from water drained off peatlands reacts within aquatic ecosystems and is converted to CO₂, which is then emitted to the atmosphere (Billet et al. 2004 as cited in IPCC 2013). During the horticultural and landscaping use of peat, nutrient-poor (but fertilizer-enriched) peat tends to be used in bedding plants and in greenhouse and plant nursery production, whereas nutrient-rich (but relatively coarse) peat is used directly in landscaping, athletic fields, golf courses, and plant nurseries. Most (nearly 94

percent) of the CO₂ emissions from peat occur off-site, as the peat is processed and sold to firms which, in the United States, use it predominantly for the aforementioned horticultural and landscaping purposes.

Total emissions from Peatlands Remaining Peatlands are estimated to be 0.7 MMT CO_2 Eq. in 2021 (see Table 6-48 and Table 6-49) comprising 0.7 MMT CO_2 Eq. (700 kt) of CO_2 , 0.004 MMT CO_2 Eq. (0.15 kt) of CO_2 Eq. (0.002 kt) of CO_2

Total emissions from Peatlands Remaining Peatlands have fluctuated between 0.7 and 1.3 MMT CO₂ Eq. across the time series with a decreasing trend from 1990 until 1993, followed by an increasing trend until reaching peak emissions in 2000. After 2000, emissions generally decreased until 2006 and then increased until 2009. The trend reversed in 2009 and total emissions have generally decreased between 2009 and 2021. Carbon dioxide emissions from Peatlands Remaining Peatlands have fluctuated between 0.7 and 1.3 MMT CO₂ across the time series, and these emissions drive the trends in total emissions. Methane and N₂O emissions remained close to zero across the time series.

Table 6-48: Emissions from Peatlands Remaining Peatlands (MMT CO₂ Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	1.1	1.1	0.8	0.8	0.8	0.7	0.7
Off-site	1.0	1.0	0.8	0.7	0.7	0.7	0.7
On-site	0.1	0.1	0.1	0.1	0.1	+	+
CH ₄ (On-site)	+	+	+	+	+	+	+
N ₂ O (On-site)	+	+	+	+	+	+	+
Total	1.1	1.1	0.8	0.8	0.8	0.7	0.7

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 6-49: Emissions from Peatlands Remaining Peatlands (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO ₂	1,055	1,101	829	795	757	733	700
Off-site	985	1,030	774	744	707	683	653
On-site	70	71	55	51	50	50	48
CH ₄ (On-site)	+	+	+	+	+	+	+
N ₂ O (On-site)	+	+	+	+	+	+	+

⁺ Does not exceed 0.5 kt

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Off-Site CO₂ Emissions

Carbon dioxide emissions from domestic peat production were estimated using a Tier 1 methodology consistent with IPCC (2006). Off-site CO₂ emissions from Peatlands Remaining Peatlands were calculated by apportioning the annual weight of peat produced in the United States (Table 6-50) into peat extracted from nutrient-rich deposits and peat extracted from nutrient-poor deposits using annual percentage-by-weight figures. These nutrient-rich and nutrient-poor production values were then multiplied by the appropriate default C fraction conversion factor taken from IPCC (2006) in order to obtain off-site emission estimates. For the conterminous 48 states, both annual percentages of peat type by weight and domestic peat production data were sourced from estimates and industry statistics provided in the *Minerals Yearbook* and *Mineral Commodity Summaries* from the U.S. Geological Survey (USGS 1995 through 2018; USGS 2022a; USGS 2022b; USGS 2022c). Hawaii is assumed to have no peat production due to its absence from these sources. To develop these data, the U.S. Geological Survey (USGS; U.S. Bureau of Mines prior to 1997) obtained production and use information by surveying domestic peat producers. On average,

about 75 percent of the peat operations respond to the survey; USGS estimates data for non-respondents on the basis of prior-year production levels (Apodaca 2011).

Filed 01/31/24

The estimates for Alaska rely on reported peat production from the annual Alaska's Mineral Industry reports (DGGS 1993 through 2015). Similar to the U.S. Geological Survey, the Alaska Department of Natural Resources, Division of Geological & Geophysical Surveys (DGGS) solicits voluntary reporting of peat production from producers for the Alaska's Mineral Industry report. However, the report does not estimate production for the non-reporting producers, resulting in larger inter-annual variation in reported peat production from Alaska depending on the number of producers who report in a given year (Szumigala 2011). In addition, in both the conterminous 48 states and Alaska, large variations in peat production can also result from variation in precipitation and the subsequent changes in moisture conditions, since unusually wet years can hamper peat production. The methodology estimates emissions from Alaska separately from the conterminous 48 states because Alaska previously conducted its own mineral surveys and reported peat production by volume, rather than by weight (Table 6-51). However, volume production data were used to calculate off-site CO2 emissions from Alaska applying the same methodology but with volume-specific C fraction conversion factors from IPCC (2006).⁶¹ Peat production was not reported for 2015 in Alaska's Mineral Industry 2014 report (DGGS 2015), and reliable data are not available beyond 2012, so Alaska's peat production in 2013 through 2021 (reported in cubic yards) was assumed to be equal to the 2012 value.

Consistent with IPCC (2013) guidelines, off-site CO2 emissions from dissolved organic carbon were estimated based on the total area of peatlands managed for peat extraction, which is calculated from production data using the methodology described in the On-Site CO₂ Emissions section below. Carbon dioxide emissions from dissolved organic C were estimated by multiplying the area of managed peatlands by the default emission factor for dissolved organic C provided in IPCC (2013).

The United States has largely imported peat from Canada for horticultural purposes; in 2021, imports of Sphagnum moss (nutrient-poor) peat from Canada represented 96 percent of total U.S. peat imports and 80 percent of U.S. domestic consumption (USGS 2022c). Most peat produced in the United States is reed-sedge peat, generally from southern states, which is classified as nutrient-rich by IPCC (2006). To be consistent with the Tier 1 method, only domestic peat production is accounted for when estimating off-site emissions. Higher-tier calculations of CO2 emissions from apparent consumption would involve consideration of the percentages of peat types stockpiled (nutrient-rich versus nutrient-poor) as well as the percentages of peat types imported and exported.

Table 6-50: Peat Production of Conterminous 48 States (kt)

Type of Deposit	1990	2005	2017	2018	2019	2020	2021
Nutrient-Rich	595.1	657.6	423.3	416.7	410.4	430.7	378.0
Nutrient-Poor	55.4	27.4	74.7	62.3	45.6	13.3	42.0
Total Production	692.0	685.0	498.0	479.0	456.0	444.0	420.0

Sources: United States Geological Survey (USGS) (1991–2017) Minerals Yearbook: Peat (1994–2016); United States Geological Survey (USGS) (2018) Minerals Yearbook: Peat - Tables-only release (2018); United States Geological Survey (USGS) (2021) Mineral Commodity Summaries: Peat (2021).

Table 6-51: Peat Production of Alaska (Thousand Cubic Meters)

	1990	2005	2017	2018	2019	2020	2021
Total Production	49.7	47.8	93.1	93.1	93.1	93.1	93.1

Sources: Division of Geological & Geophysical Surveys (DGGS), Alaska Department of Natural Resources (1997–2015) Alaska's Mineral Industry Report (1997–2014).

⁶¹ Peat produced from Alaska was assumed to be nutrient poor; as is the case in Canada, "where deposits of high-quality [but nutrient poor] Sphagnum moss are extensive" (USGS 2008).

On-site CO₂ Emissions

IPCC (2006) suggests basing the calculation of on-site emission estimates on the area of peatlands managed for peat extraction differentiated by the nutrient type of the deposit (rich versus poor). Information on the area of land managed for peat extraction is currently not available for the United States, but consistent with IPCC (2006), an average production rate for the industry was applied to derive a land area estimate. In a mature industrialized peat industry, such as exists in the United States and Canada, the vacuum method can extract up to 100 metric tons per hectare per year (Cleary et al. 2005 as cited in IPCC 2006). ⁶² The area of land managed for peat extraction in the conterminous 48 states of the United States was estimated using both nutrient-rich and nutrient-poor production data and the assumption that 100 metric tons of peat are extracted from a single hectare in a single year, see Table 6-52. The annual land area estimates were then multiplied by the IPCC (2013) default emission factor in order to calculate on-site CO₂ emission estimates.

Production data are not available by weight for Alaska. In order to calculate on-site emissions resulting from Peatlands Remaining Peatlands in Alaska, the production data by volume were converted to weight using annual average bulk peat density values, and then converted to land area estimates using the assumption that a single hectare yields 100 metric tons, see Table 6-53. The IPCC (2006) on-site emissions equation also includes a term that accounts for emissions resulting from the change in C stocks that occurs during the clearing of vegetation prior to peat extraction. Area data on land undergoing conversion to peatlands for peat extraction is also unavailable for the United States. However, USGS records show that the number of active operations in the United States has been declining since 1990; therefore, it seems reasonable to assume that no new areas are being cleared of vegetation for managed peat extraction. Other changes in C stocks in living biomass on managed peatlands are also assumed to be zero under the Tier 1 methodology (IPCC 2006 and 2013).

Table 6-52: Peat Production Area of Conterminous 48 States (Hectares)

	1990°	2005	2017	2018	2019	2020	2021
Nutrient-Rich	5,951	6,576	4,233	4,167	4,104	4,307	3,780
Nutrient-Poor	554	274	747	623	456	133	420
Total Production	6,920	6,850	4,980	4,790	4,560	4,440	4,200

^a A portion of the production in 1990 is of unknown nutrient type, resulting in a total production value greater than the sum of nutrient-rich and nutrient-poor.

Table 6-53: Peat Production Area of Alaska (Hectares)

	1990	2005	2017	2018	2019	2020	2021
Nutrient-Rich	0	0	0	0	0	0	0
Nutrient-Poor	286	104	333	212	329	428	428
Total Production	286	104	333	212	329	428	428

On-site N2O Emissions

IPCC (2006) indicates the calculation of on-site N_2O emission estimates using Tier 1 methodology only considers nutrient-rich peatlands managed for peat extraction. These area data are not available directly for the United States, but the on-site CO_2 emissions methodology above details the calculation of nutrient-rich area data from production data. In order to estimate N_2O emissions, the land area estimate of nutrient-rich Peatlands Remaining Peatlands was multiplied by the appropriate default emission factor taken from IPCC (2013). See Planned Improvements section for additional information on the basis of land area estimates.

⁶² The vacuum method is one type of extraction that annually "mills" or breaks up the surface of the peat into particles, which then dry during the summer months. The air-dried peat particles are then collected by vacuum harvesters and transported from the area to stockpiles (IPCC 2006).

On-site CH₄ Emissions

IPCC (2013) also suggests basing the calculation of on-site CH₄ emission estimates on the total area of peatlands managed for peat extraction. Area data is derived using the calculation from production data described in the Onsite CO₂ Emissions section above. In order to estimate CH₄ emissions from drained land surface, the land area estimate of Peatlands Remaining Peatlands was multiplied by the emission factor for direct CH₄ emissions taken from IPCC (2013). In order to estimate CH₄ emissions from drainage ditches, the total area of peatland was multiplied by the default fraction of peatland area that contains drainage ditches, and the appropriate emission factor taken from IPCC (2013). See Table 6-54 for the calculated area of ditches and drained land.

Table 6-54: Peat Production (Hectares)

	1990	2005	2017	2018	2019	2020	2021
Conterminous 48 States							
Area of Drained Land	6,574	6,508	4,731	4,551	4,332	4,218	3,990
Area of Ditches	346	343	249	240	228	222	210
Total Production	6,920	6,850	4,980	4,790	4,560	4,440	4,200
Alaska							
Area of Drained Land	272	99	317	202	312	407	407
Area of Ditches	14	5	17	11	16	21	21
Total Production	286	104	333	212	329	428	212

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. The same data sources were used throughout the time series, when available. When data were unavailable or the available data were outliers, missing values were estimated based on the past available data.

Uncertainty

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the uncertainty of CO₂, CH₄, and N₂O emissions from Peatlands Remaining Peatlands for 2021, using the following assumptions:

- The uncertainty associated with peat production data was estimated to be ± 25 percent (Apodaca 2008) and assumed to be normally distributed.
- The uncertainty associated with peat production data stems from the fact that the USGS receives data from the smaller peat producers but estimates production from some larger peat distributors. The peat type production percentages were assumed to have the same uncertainty values and distribution as the peat production data (i.e., ± 25 percent with a normal distribution).
- The uncertainty associated with the reported production data for Alaska was assumed to be the same as
 for the conterminous 48 states, or ± 25 percent with a normal distribution. It should be noted that the
 DGGS estimates that around half of producers do not respond to their survey with peat production data;
 therefore, the production numbers reported are likely to underestimate Alaska peat production
 (Szumigala 2008).
- The uncertainty associated with the average bulk density values was estimated to be ± 25 percent with a normal distribution (Apodaca 2008).
- IPCC (2006 and 2013) gives uncertainty values for the emissions factors for the area of peat deposits managed for peat extraction based on the range of underlying data used to determine the emission factors. The uncertainty associated with the emission factors was assumed to be triangularly distributed.
- The uncertainty values surrounding the C fractions were based on IPCC (2006) and the uncertainty was assumed to be uniformly distributed.

The uncertainty values associated with the fraction of peatland covered by ditches was assumed to be ±
100 percent with a normal distribution based on the assumption that greater than 10 percent coverage,
the upper uncertainty bound, is not typical of drained organic soils outside of The Netherlands (IPCC
2013).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 6-55. Carbon dioxide emissions from Peatlands Remaining Peatlands in 2021 were estimated to be between 0.6 and 0.8 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of 16 percent below to 16 percent above the 2021 emission estimate of 0.7 MMT CO₂ Eq. Methane emissions from Peatlands Remaining Peatlands in 2021 were estimated to be between 0.002 and 0.007 MMT CO₂ Eq. This indicates a range of 58 percent below to 80 percent above the 2021 emission estimate of 0.004 MMT CO₂ Eq. Nitrous oxide emissions from Peatlands Remaining Peatlands in 2021 were estimated to be between 0.0003 and 0.0008 MMT CO₂ Eq. at the 95 percent confidence level. This indicates a range of 52 percent below to 53 percent above the 2021 emission estimate of 0.0005 MMT CO₂ Eq.

Table 6-55: Approach 2 Quantitative Uncertainty Estimates for CO₂, CH₄, and N₂O Emissions from Peatlands Remaining Peatlands (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate			ive to Emissio	
		(MMT CO ₂ Eq.)	(MMT (CO ₂ Eq.)	(9	%)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Peatlands Remaining Peatlands	CO ₂	0.7	0.6	0.8	-16%	16%
Peatlands Remaining Peatlands	CH_4	+	+	+	-58%	80%
Peatlands Remaining Peatlands	N_2O	+	+	+	-52%	53%

⁺ Does not exceed 0.05 MMT CO₂ Eq.

QA/QC and Verification

A QA/QC analysis was performed to review input data and calculations, and no issues were identified. In addition, the emission trends were analyzed to ensure they reflected activity data trends.

Recalculations Discussion

The conterminous 48 states peat production estimates for Peatlands Remaining Peatlands were updated using the Peat section of the *Mineral Commodity Summaries 2022*. The 2022 edition updated 2018, 2019, and 2020 peat production data and provided peat type production estimates for 2021. The updated data increased previously estimated emissions for 2018 by 0.4 percent, 2019 by 0.2 percent, and 2020 by 3.5 percent versus estimated emissions for 2018, 2019, and 2020 in the previous (i.e., 1990 through 2020) Inventory for Peatlands Remaining Peatlands.

Although Alaska peat production data for 2015 through 2021 were unavailable, 2014 data are available in the *Alaska's Mineral Industry 2014* report. However, the reported values represented an apparent 98 percent decrease in production since 2012. Due to the uncertainty of the most recent data, 2013, 2014, 2015, 2016, 2017, 2018, 2019, and 2020 values were assumed to be equal to the 2012 value, seen in the *Alaska's Mineral Industry 2013* report. If updated Alaska data are available for the next Inventory cycle, this will result in a recalculation in the next (i.e., 1990 through 2021) Inventory report.

EPA updated global warming potentials (GWP) for calculating CO_2 -equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC Fourth Assessment Report (AR4). This update was applied across the entire time series. This change resulted in an 11 percent reduction in CO_2 Eq. emissions for N_2O across the time series, as well as a 12 percent increase in CO_2 Eq. emissions for CH_4 across the

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The cumulative effect of all of these changes was an average increase of 0.2 percent across the time series, with the smallest increase of 0.05 percent (0.0005 MMT CO_2 Eq.) in 1996 to the largest increase of 3.6 percent (0.03 MMT CO_2 Eq.) in 2020.

Planned Improvements

EPA notes the following improvements may be implemented or investigated within the next two or three inventory cycles pending time and resource constraints:

• The implied emission factors will be calculated and included in this chapter for future Inventories. Currently, the N₂O emissions calculation uses different land areas than the CO₂ and CH₄ emission calculations (see Methodology and Time Series Consistency in this chapter), so estimating the implied emission factor per total land area is not appropriate. The inclusion of implied emission factors in this chapter will provide another method of QA/QC and verification for Inventory data.

EPA notes the following improvements will continue to be investigated as time and resources allow, but there are no immediate plans to implement until data are available or identified:

- In order to further improve estimates of CO₂, N₂O, and CH₄ emissions from Peatlands Remaining Peatlands, future efforts will investigate if improved data sources exist for determining the quantity of peat harvested per hectare and the total area of land undergoing peat extraction.
- EPA plans to identify a new source for Alaska peat production. The current source has not been reliably updated since 2012 and Alaska Department of Natural Resources indicated future publication of data has been discontinued.
- Edits to the trends and methodology sections are planned based on expert review comments.

Coastal Wetlands Remaining Coastal Wetlands

Consistent with ecological definitions of wetlands, ⁶³ the United States has historically included under the category of Wetlands those coastal shallow water areas of estuaries and bays that lie within the extent of the Land Representation. Guidance on quantifying greenhouse gas emissions and removals on Coastal Wetlands is provided in the 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands (Wetlands Supplement), which recognizes the particular importance of vascular plants in sequestering CO₂ from the atmosphere within biomass, dead organic material (DOM; including litter and dead wood stocks) and soils. Thus, the Wetlands Supplement provides specific guidance on quantifying emissions and removals on organic and mineral soils that are covered or saturated for part of the year by tidal fresh, brackish or saline water and are vegetated by vascular plants and may extend seaward to the maximum depth of vascular plant vegetation. The United States calculates emissions and removals based upon the stock change method for soil carbon (C) and the gain-loss method for biomass and DOM. Presently, this Inventory does not calculate the lateral flux of C to or from any land use. Lateral transfer of organic C to coastal wetlands and to marine sediments within U.S. waters is the subject of ongoing scientific investigation; there is currently no IPCC methodological guidance for lateral fluxes of C.

The United States recognizes both Vegetated Wetlands and Unvegetated Open Water as Coastal Wetlands. Per guidance provided by the *Wetlands Supplement*, sequestration of C into biomass, DOM and soil C pools is recognized only in Vegetated Coastal Wetlands and does not occur in Unvegetated Open Water Coastal Wetlands.

_

⁶³ See https://water.usgs.gov/nwsum/WSP2425/definitions.html; accessed August 2021.

The United States takes the additional step of recognizing that C stock losses occur when Vegetated Coastal Wetlands are converted to Unvegetated Open Water Coastal Wetlands.

This Inventory includes all privately- and publicly-owned coastal wetlands (i.e., mangroves and tidal marsh) along the oceanic shores of the conterminous United States, but does not include Coastal Wetlands Remaining Coastal Wetlands in Alaska, Hawaii, or any of the United States Territories. Seagrasses are not currently included within the Inventory due to insufficient data on distribution, change through time and C stocks or C stock changes as a result of anthropogenic influence (see Planned Improvements).

Under the Coastal Wetlands Remaining Coastal Wetlands category, the following emissions and removals are quantified in this chapter:

- 1) Carbon stock changes and CH₄ emissions on Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands,
- Carbon stock changes on Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands,
- 3) Carbon stock changes on Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands, and
- 4) Nitrous Oxide Emissions from Aquaculture in Coastal Wetlands.

Vegetated coastal wetlands hold C in all five C pools (i.e., aboveground biomass, belowground biomass, dead organic matter [DOM; dead wood and litter], and soil), though typically soil C and, to a lesser extent, aboveground and belowground biomass are the dominant pools, depending on wetland type (i.e., forested vs. marsh). Vegetated Coastal Wetlands are net accumulators of C over centuries to millennia as soils accumulate C under anaerobic soil conditions and C accumulates in plant biomass. Large emissions from soil C and biomass stocks occur when Vegetated Coastal Wetlands are converted to Unvegetated Open Water Coastal Wetlands (e.g., when Vegetated Coastal Wetlands are lost due to subsidence, channel cutting through Vegetated Coastal Wetlands), but are still recognized as Coastal Wetlands in this Inventory. These C stock losses resulting from conversion to Unvegetated Open Water Coastal Wetlands can cause the release of decades to centuries of accumulated soil C, as well as the standing stock of biomass C. Conversion of Unvegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands, either through restoration efforts or naturally, initiates the building of C stocks within soils and biomass. In applying the Wetlands Supplement methodologies for estimating CH₄ emissions, coastal wetlands in salinity conditions greater than 18 parts per thousand have little to no CH4 emissions compared to those experiencing lower salinity brackish and freshwater conditions. Therefore, conversion of Vegetated Coastal Wetlands to or from Unvegetated Open Water Coastal Wetlands are conservatively assumed to not result in a change in salinity condition and are assumed to have no impact on CH₄ emissions. The Wetlands Supplement provides methodologies to estimate N₂O emissions from coastal wetlands that occur due to aquaculture. The N₂O emissions from aquaculture result from the N derived from consumption of the applied food stock that is then excreted as N load available for conversion to N₂O. While N₂O emissions can also occur due to anthropogenic N loading from the watershed and atmospheric deposition, these emissions are not reported here to avoid doublecounting of indirect N₂O emissions with the Agricultural Soils Management, Forest Land and Settlements categories.

The Wetlands Supplement provides methodologies for estimating C stock changes and CH₄ emissions from mangroves, tidal marshes and seagrasses. Depending upon their height and area, C stock changes from mangroves may be reported under the Forest Land category or under Coastal Wetlands. If mangrove stature is 5 m or greater or if there is evidence that trees can obtain that height, mangroves are reported under the Forest Land category because they meet the definition of Forest Land. Mangrove forests that are less than 5 m are reported under Coastal Wetlands because they meet the definition of Wetlands. All other non-drained, intact coastal marshes are reported under Coastal Wetlands.

Because of human activities and level of regulatory oversight, all coastal wetlands within the conterminous United States are included within the managed land area described in Section 6.1, and as such, estimates of C stock changes, emissions of CH₄, and emissions of N₂O from aquaculture from all coastal wetlands are included in this Inventory. At the present stage of inventory development, Coastal Wetlands are not explicitly shown in the Land Representation analysis while work continues to harmonize data from NOAA's Coastal Change Analysis Program (C-CAP)⁶⁴ with NRI, FIA and NLDC data used to compile the Land Representation. However, a check was undertaken to confirm that Coastal Wetlands recognized by C-CAP represented a subset of Wetlands recognized by the NRI for marine coastal states.

The greenhouse gas fluxes for all four wetland categories described above are summarized in Table 6-56. Coastal Wetlands Remaining Coastal Wetlands are generally a net C sink, with the fluxes ranging from -3.3 to -4.4 MMT CO₂ Eq. across the majority of the time series; however, between 2006 and 2010, they were a net source of emissions (ranging from 5.6 to 5.9 MMT CO₂ Eq.), resulting from a large loss of vegetated coastal wetlands to open water due to hurricanes (Table 6-56). Recognizing removals of CO2 to soil of 10.2 MMT CO2 Eq. and CH4 emissions of 4.3 MMT CO₂ Eq. in 2021, Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands are a net sink of 5.9MMT CO₂ Eq. Loss of coastal wetlands, primarily in the Mississippi Delta as a result of hurricane impacts and sediment diversion and other human impacts, recognized as Vegetated Coastal Wetlands Converted to Unvegetated Coastal Wetlands, drive an emission of 1.5 MMT CO₂ Eq. since 2011, primarily from soils. Building of new wetlands from open water, recognized as Unvegetated Coastal Wetlands Converted to Vegetated Coastal, results each year in removal of 0.1 MMT CO₂ Eq. Aquaculture is a minor industry in the United States, resulting in an emission of N₂O across the time series of between 0.1 to 0.2 MMT CO₂ Eq. In total, Coastal Wetlands are a net sink of 4.4 MMT CO₂ Eq. in 2021.

Table 6-56: Emissions and Removals from Coastal Wetlands Remaining Coastal Wetlands (MMT CO₂ Eq.)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Vegetated Coastal Wetlands							
Remaining Vegetated Coastal							
Wetlands	(6.0)	(6.0)	(5.9)	(5.9)	(5.9)	(5.9)	(5.9)
Biomass C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Flux	(10.1)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)
Net CH ₄ Flux	4.2	4.2	4.3	4.3	4.3	4.3	4.3
Vegetated Coastal Wetlands							
Converted to Unvegetated Open							
Water Coastal Wetlands	1.8	2.6	1.5	1.5	1.5	1.5	1.5
Biomass C Flux	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Organic Matter C Flux	+	+	+	+	+	+	+
Soil C Flux	1.7	2.5	1.5	1.5	1.5	1.5	1.5
Unvegetated Open Water Coastal							
Wetlands Converted to Vegetated							
Coastal Wetlands	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Biomass C Flux	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Dead Organic Matter C Flux	(+)	(+)	+	+	+	+	+
Soil C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Net N₂O Flux from Aquaculture in							
Coastal Wetlands	0.1	0.2	0.1	0.1	0.1	0.1	0.1
Total Biomass C Flux	+	+	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Total Dead Organic Matter C Flux	(+)	(+)	+	+	+	+	+
Total Soil C Flux	(8.4)	(7.7)	(8.7)	(8.7)	(8.7)	(8.7)	(8.7)
Total CH ₄ Flux	4.2	4.2	4.3	4.3	4.3	4.3	4.3
Total N₂O Flux	0.1	0.2	0.1	0.1	0.1	0.1	0.1

⁶⁴ See https://coast.noaa.gov/digitalcoast/tools/lca.html; accessed August 2021.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 630 of 1050 PageID 4078

()	Total Flux	(4.1)	(3.3)	(4.4)	(4.4)	(4.4)	(4.4)	(4.3
----	------------	-------	-------	-------	-------	-------	-------	------

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Emissions and Removals from Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands

The conterminous United States currently has 2.98 million hectares of intertidal Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands comprised of tidally influenced palustrine emergent marsh (661,731 ha), palustrine scrub shrub (133,365 ha) and estuarine emergent marsh (1,893,276 ha), estuarine scrub shrub (94,667 ha) and estuarine forested wetlands (195,221 ha). Mangroves fall under both estuarine forest and estuarine scrub shrub categories depending upon height. Dwarf mangroves, found in subtropical states along the Gulf of Mexico, do not attain the height status to be recognized as Forest Land, and are therefore always classified within Vegetated Coastal Wetlands. Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands are found in cold temperate (53,970 ha), warm temperate (896,287 ha), subtropical (1,965,242 ha) and Mediterranean (62,761 ha) climate zones.

Soils are the largest C pool in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands, reflecting long-term removal of atmospheric CO₂ by vegetation and transfer into the soil pool in the form of both autochthonous and allochthonous decaying organic matter. Soil C emissions are not assumed to occur in coastal wetlands that remain vegetated. This Inventory includes changes in C stocks in both biomass and soils. Changes in DOM C stocks are not included. Methane emissions from decomposition of organic matter in anaerobic conditions are present at salinity less than half that of sea water. Mineral and organic soils are not differentiated in terms of C stock changes or CH₄ emissions.

Table 6-57 through Table 6-59 summarize nationally aggregated biomass and soil C stock changes and CH₄ emissions on Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands. Intact Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands hold a total biomass C stock of 35.95 MMT C. Removals from biomass C stocks in 2021 were 0.05 MMT CO₂ Eq. (0.01 MMT C), which has increased over the time series (Table 6-57 and Table 6-58). Carbon dioxide emissions from biomass in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands between 2002 and 2011, with very low sequestration between 2002 and 2006 and emissions of 0.21 MMT CO₂ Eq. between 2007 and 2011, are not inherently typical and are a result of coastal wetland loss over time. Most of the coastal wetland loss has occurred in palustrine and estuarine emergent wetlands. Vegetated coastal wetlands maintain a large C stock within the top 1 meter of soil (estimated to be 804 MMT C) to which C accumulated at a rate of 10.2 MMT CO₂ Eq. (2.8 MMT C) in 2021, a value that has remained relatively constant across the reporting period. For Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands, methane emissions of 4.3 of MMT CO₂ Eq. (154 kt CH₄) in 2021 (Table 6-59) offset C removals resulting in a net removal of 5.9 MMT CO₂ Eq. in 2021; this rate has been relatively consistent across the reporting period. Dead organic matter stock changes are not calculated in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands since this stock is considered to be in a steady state when using Tier 1 methods (IPCC 2014). Due to federal regulatory protection, loss of Vegetated Coastal Wetlands through human activities slowed considerably in the 1970s and the current annual rates of C stock change and CH₄ emissions are relatively constant over time.

Table 6-57: Net CO₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil Flux	(10.1)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)
Total C Stock Change	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq.

Note: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Table 6-58: Net CO₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT C)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	(+)	+	(+)	(+)	(+)	(+)	(+)
Soil Flux	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)
Total C Stock Change	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)

⁺ Absolute value does not exceed 0.05 MMT C.

Note: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Table 6-59: CH₄ Emissions from Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT CO₂ Eq. and kt CH₄)

Year	1990	2005	2017	2018	2019	2020	2021
Methane Emissions (MMT CO ₂ Eq.)	4.2	4.2	4.3	4.3	4.3	4.3	4.3
Methane Emissions (kt CH ₄)	149	151	153	153	153	154	154

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate changes in biomass C stocks, soil C stocks and emissions of CH₄ for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands. Dead organic matter is not calculated for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands since it is assumed to be in steady state (IPCC 2014).

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Above- and belowground biomass C stocks for palustrine (freshwater) and estuarine (saline) marshes are estimated for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands on land below the elevation of high tides (taken to be mean high water spring tide elevation) and as far seawards as the extent of intertidal vascular plants according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2006, 2010, and 2016 NOAA C-CAP surveys (NOAA OCM 2020). C-CAP areas are calculated at the state/territory level and summed according to climate zone to national values. Federal and nonfederal lands are represented. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets. Based upon NOAA C-CAP, coastal wetlands are subdivided into palustrine and estuarine classes and further subdivided into emergent marsh, scrub shrub and forest classes (Table 6-60). Biomass is not sensitive to soil organic matter content but is differentiated based on climate zone. Aboveground biomass C stocks for nonforested wetlands data are derived from a national assessment combining field plot data and aboveground biomass mapping by remote sensing (Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). The aboveground biomass C stock for subtropical estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a meta-analysis by Lu and Megonigal (2017). Root to shoot ratios from the Wetlands Supplement (Table 6-62; IPCC 2014) were used to account for belowground biomass, which were multiplied by the aboveground C stock. Above- and belowground values were summed to obtain total biomass C stocks. Biomass C stock changes per year for Wetlands Remaining Wetlands were determined by calculating the difference in area between that year and the previous year to calculate gain/loss of area for each climate type, which was multiplied by the mean biomass for that climate type.

Table 6-60: Area of Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands, Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands, and Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (ha)

Year	1990	2005	2017	2018	2019	2020	2021
Vegetated Coastal Wetlands							
Remaining Vegetated Coastal							
Wetlands	2,975,477	2,985,783	2,973,256	2,974,523	2,975,789	2,977,055	2,978,322
Vegetated Coastal Wetlands							
Converted to Unvegetated							
Open Water Coastal Wetlands	1,720	2,515	1,488	1,488	1,488	1,488	1,488
Unvegetated Open Water							
Coastal Wetlands Converted to							
Vegetated Coastal Wetlands	952	1,769	2,406	2,406	2,406	2,406	2,406

Table 6-61: Aboveground Biomass Carbon Stocks for Vegetated Coastal Wetlands (t C ha-1)

		Climate Zon	е	
Wetland Type	Cold Temperate	Warm Temperate	Subtropical	Mediterranean
Palustrine Scrub/Shrub Wetland	3.25	3.17	2.24	4.69
Palustrine Emergent Wetland	3.25	3.17	2.24	4.69
Estuarine Forested Wetland	N/A	N/A	17.83	N/A
Estuarine Scrub/Shrub Wetland	3.05	3.05	2.43	3.44
Estuarine Emergent Wetland	3.05	3.10	2.43	3.44

Source: All data from Byrd et al. (2017, 2018 and 2020) except for subtropical estuarine forested wetlands, which is from Lu and Megonigal (2017); N/A means there are currently no estuarine forested wetlands that are less than 5 meters tall; these forested wetlands meet the definition of forest land and are included in the Forest Land chapter.

Table 6-62: Root to Shoot Ratios for Vegetated Coastal Wetlands

		Climate Zone						
Wetland Type	Cold Temperate	Warm Temperate	Subtropical	Mediterranean				
Palustrine Scrub/Shrub Wetland	1.15	1.15	3.65	3.63				
Palustrine Emergent Wetland	1.15	1.15	3.65	3.63				
Estuarine Forested Wetland	N/A	N/A	0.96	N/A				
Estuarine Scrub/Shrub Wetland	2.11	2.11	3.65	3.63				
Estuarine Emergent Wetland	2.11	2.11	3.65	3.63				

Source: All values from IPCC (2014); N/A means there are currently no estuarine forested wetlands that are less than 5 meters tall; these forested wetlands meet the definition of forest land and are included in the Forest Land chapter.

Soil Carbon Stock Changes

Soil C stock changes are estimated for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands for both mineral and organic soils. Soil C stock changes, stratified by climate zones and wetland classes, are derived from a synthesis of peer-reviewed literature (Table 6-63; Lynch 1989; Orson et al. 1990; Kearny & Stevenson 1991; Roman et al. 1997; Craft et al. 1998; Orson et al. 1998; Merrill 1999; Hussein et al. 2004; Church et al. 2006; Köster et al. 2007; Callaway et al. 2012a&b; Bianchi et al. 2013; Crooks et al. 2014; Weston et al. 2014; Villa & Mitsch 2015; Marchio et al. 2016; Noe et al. 2016).

Tier 2 estimates of soil C removals associated with annual soil C accumulation on managed Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands were developed with country-specific soil C removal factors multiplied by activity data of land area for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands. The methodology follows Eq. 4.7, Chapter 4 of the Wetlands Supplement, and is applied to the area of Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands on an annual basis. To estimate soil C stock changes, no differentiation is made between organic and mineral soils since currently no statistical evidence supports disaggregation (Holmquist et al. 2018).

Table 6-63: Annual Soil Carbon Accumulation Rates for Vegetated Coastal Wetlands (t C ha-1 yr⁻¹)

Climate Zone	Cold Temperate	Warm Temperate	Subtropical	Mediterranean
Palustrine Scrub/Shrub Wetland	1.01	1.54	0.45	0.85
Palustrine Emergent Wetland	1.01	1.54	0.45	0.85
Estuarine Forested Wetland	N/A	N/A	0.87	N/A
Estuarine Scrub/Shrub Wetland	1.01	0.82	1.09	0.85
Estuarine Emergent Wetland	2.17	0.82	1.09	0.85

Source: All data from Lu and Megonigal (2017)⁶⁵; N/A means there are currently no estuarine forested wetlands that are less than 5 meters tall; these forested wetlands meet the definition of forest land and are included in the Forest Land chapter.

Soil Methane Emissions

Tier 1 estimates of CH₄ emissions for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands are derived from the same wetland map used in the analysis of wetland soil C fluxes, produced from C-CAP, LiDAR and tidal data, in combination with default CH₄ emission factors provided in Table 4.14 of the Wetlands Supplement. The methodology follows Equation 4.9, Chapter 4 of the Wetlands Supplement; Tier 1 emissions factors are multiplied by the area of freshwater (palustrine) coastal wetlands. The CH₄ fluxes applied are determined based on salinity; only palustrine wetlands are assumed to emit CH₄. Estuarine coastal wetlands in the C-CAP classification include wetlands with salinity less than 18 ppt, a threshold at which methanogenesis begins to occur (Poffenbarger et al. 2011), but the dataset currently does not differentiate estuarine wetlands based on their salinities and, as a result, CH₄ emissions from estuarine wetlands are not included at this time.

Uncertainty

Underlying uncertainties in the estimates of soil and biomass C stock changes and CH₄ emissions include uncertainties associated with Tier 2 literature values of soil C stocks, biomass C stocks and CH₄ flux, assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data. Uncertainty specific to Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands include differentiation of palustrine and estuarine community classes, which determines the soil C stock and CH4 flux applied. Uncertainties for soil and biomass C stock data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment of a C stock to a disaggregation of a community class. Because mean soil and biomass C stocks for each available community class are in a fairly narrow range, the same overall uncertainty was assigned to each, respectively (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). Uncertainty for root to shoot ratios, which are used for quantifying belowground biomass, are derived from the 2013 Wetlands Supplement. Uncertainties for CH₄ flux are the Tier 1 default values reported in the 2013 IPCC Wetlands Supplement. Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (±10 to 15 percent; IPCC 2003). However, there is significant uncertainty in salinity ranges for tidal and non-tidal estuarine wetlands and activity data used to apply CH₄ flux emission factors (delineation of an 18 ppt boundary) that will need significant improvement to reduce uncertainties. Details on the emission/removal trends and methodologies through time

⁶⁵ See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed August 2022.

are described in more detail in the introduction and the Methodology section. The combined uncertainty was calculated using the IPCC Approach 1 method of summing the squared uncertainty for each individual source (C-CAP, soil, biomass and CH₄) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-64 for each subcategory (i.e., soil C, biomass C and CH $_4$ emissions). The combined uncertainty across all subcategory is 37.0 percent below and above the estimate of -6.4 MMT CO $_2$ Eq, which is primarily driven by the uncertainty in the CH $_4$ estimates because there is high variability in CH $_4$ emissions when the salinity is less than 18 ppt. In 2021, the total flux was -6.4 MMT CO $_2$ Eq., with lower and upper estimates of -8.7 and -4.0 MMT CO $_2$ Eq.

Table 6-64: IPCC Approach 1 Quantitative Uncertainty Estimates for C Stock Changes and CH₄ Emissions occurring within Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands in 2021 (MMT CO₂ Eq. and Percent)

Source/Sink	Cas	2021 Estimate	Uncertainty Range Relative to Estimate					
Source/Silik	Gas	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Biomass C Stock Change	CO ₂	(0.05)	(0.06)	(0.03)	-24.1%	24.1%		
Soil C Stock Change	CO_2	(10.2)	(12.0)	(8.4)	-18.7%	18.7%		
CH ₄ emissions	CH ₄	4.3	3.0	5.6	-29.9%	29.9%		
Total Flux		(5.9)	(8.1)	(3.8)	-37.0%	37.0%		

Note: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

QA/QC and Verification

NOAA provided the National LiDAR Dataset, tide data, and C-CAP land cover and land cover change mapping, all of which are subject to agency internal QA/QC assessment. Acceptance of final datasets into archive and dissemination are contingent upon the product compilation being compliant with mandatory QA/QC requirements (McCombs et al. 2016). QA/QC and verification of soil C stock datasets have been provided by the Smithsonian Environmental Research Center and Coastal Wetland Inventory team leads who reviewed summary tables against reviewed sources. Biomass C stocks are derived from peer-review literature and reviewed by the U.S. Geological Survey prior to publishing, by the peer-review process during publishing, and by the Coastal Wetland Inventory team leads before inclusion in this Inventory. A team of two evaluated and verified there were no computational errors within the calculation worksheets. Soil and biomass C stock change data are based upon peer-reviewed literature and CH₄ emission factors derived from the *Wetlands Supplement*.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forest Land Remaining Forest Land. The resulting changes in emissions and removals were minimal and did not affect source or sink status, but resulted in a slight decrease in removals between 1990 and 2001 (0.03 MMT CO₂ Eq.) and 2012 to 2020 (0.001 MMT CO₂ Eq.) and a slight increase in emissions between 2002 and 2006 (0.04-0.06 MMT CO₂ Eq.) and 2007 to 2011 (0.001 MMT CO₂ Eq.). The change did not affect CH₄ emissions because no emission factor currently is applied to estuarine wetlands.

In addition, the EPA updated the global warming potential (GWP) for calculating CO₂-equivalent emissions of CH₄ (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. This change resulted in an average annual increase of 0.46 MMT CO₂ Eq., or 12 percent, in calculated CO₂-equivalent CH₄ emissions from Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands from 1990 through 2020 compared to the previous Inventory. Further discussion on this update

and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Harmonization across all spatial datasets used to calculate activity data is underway. Once completed, a better representation of forested tidal wetlands, palustrine tidal wetlands, and forest land near the tidal boundary will be obtained.

Administered by the Smithsonian Environmental Research Center, the Coastal Wetland Carbon Research Coordination Network has established a U.S. country-specific database of soil C stock and biomass estimates for coastal wetlands. ⁶⁶ This dataset is currently in review and may be update in coming months. Refined error analysis combining land cover change and C stock estimates will be provided as new data are incorporated. Through this work, a model is in development to represent updated changes in soil C stocks for estuarine emergent wetlands.

Work is currently underway to examine the feasibility of incorporating seagrass soil and biomass C stocks into the Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands estimates. Additionally, investigation into quantifying the distribution, area, and emissions resulting from impounded waters (i.e., coastal wetlands where tidal connection to the ocean has been restricted or eliminated completely) is underway.

Emissions from Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands

Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands is a source of emissions from soil, biomass, and DOM C stocks. An estimated 1,488 ha of Vegetated Coastal Wetlands were converted to Unvegetated Open Water Coastal Wetlands in 2021, which largely occurred within estuarine and palustrine emergent wetlands. Prior to 2006, annual conversion to unvegetated open water coastal wetlands was higher than current rates: 1,720 between 1990 and 2000 and 2,515 ha between 2001 and 2005. The Mississippi Delta represents more than 40 percent of the total coastal wetland of the United States, and over 90 percent of the area of Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands. The drivers of coastal wetlands loss include legacy human impacts on sediment supply through rerouting river flow, direct impacts of channel cutting on hydrology, salinity and sediment delivery, and accelerated subsidence from aquifer extraction. Each of these drivers directly contributes to wetland erosion and subsidence, while also reducing the resilience of the wetland to build with sea-level rise or recover from hurricane disturbance. Over recent decades, the rate of Mississippi Delta wetland loss has slowed, though episodic mobilization of sediment occurs during hurricane events (Couvillion et al. 2011; Couvillion et al. 2016). The land cover analysis between the 2006 and 2011 C-CAP surveys coincides with two such events, hurricanes Katrina and Rita (both making landfall in the late summer of 2005), that occurred between these C-CAP survey dates. The subsequent 2016 C-CAP survey determined that erosion rates had slowed.

Shallow nearshore open water within the U.S. Land Representation is recognized as falling under the Coastal Wetlands category within this Inventory. While high resolution mapping of coastal wetlands provides data to support IPCC Approach 2 methods for tracking land cover change, the depth in the soil profile to which sediment is lost is less clear. This Inventory adopts the Tier 1 methodological guidance from the Wetlands Supplement for estimating emissions following the methodology for excavation (see Methodology section, below) when Vegetated Coastal Wetlands are converted to Unvegetated Open Water Coastal Wetlands, assuming a 1 m depth of disturbed soil. This 1 m depth of disturbance is consistent with estimates of wetland C loss provided in the literature and the Wetlands Supplement (Crooks et al. 2009; Couvillion et al. 2011; Delaune and White 2012; IPCC 2014). The same assumption on depth of soils impacted by erosion has been applied here. It is a reasonable Tier 1 assumption,

-

⁶⁶ See https://serc.si.edu/coastalcarbon; accessed August 2021.

based on experience, but estimates of emissions are sensitive to the depth to which the assumed disturbances have occurred (Holmquist et al. 2018). A Tier 1 assumption is also adopted in that all mobilized C is immediately returned to the atmosphere (as assumed for terrestrial land-use categories), rather than redeposited in long-term C storage. The science is currently under evaluation to adopt more refined emissions factors for mobilized coastal wetland C based upon the geomorphic setting of the depositional environment.

In 2021, there were 1,488 ha of Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands (Table 6-60) across all wetland types and climates, which resulted in 1.5 MMT CO₂ Eq. (0.4 MMT C) and 0.06 MMT CO₂ Eq. (0.02 MMT C) lost through soil and biomass, respectively, with minimal DOM C stock loss (Table 6-65, and Table 6-66). Across the reporting period, the area of vegetated coastal wetlands converted to unvegetated open water coastal wetlands was greatest between the 2006 to 2011 C-CAP reporting period (11,373 ha) and has decreased since then to current levels (Table 6-60).

Table 6-65: Net CO₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Organic Matter Flux	+	+	+	+	+	+	+
Soil Flux	1.7	2.5	1.5	1.5	1.5	1.5	1.5
Total C Stock Change	1.8	2.6	1.5	1.5	1.5	1.5	1.5

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 6-66: Net CO₂ Flux from C Stock Changes in Vegetated Coastal Wetlands Converted to **Unvegetated Open Water Coastal Wetlands (MMT C)**

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	+	+	+	+	+	+	+
Dead Organic Matter Flux	+	+	+	+	+	+	+
Soil Flux	0.5	0.7	0.4	0.4	0.4	0.4	0.4
Total C Stock Change	0.5	0.7	0.4	0.4	0.4	0.4	0.4

⁺ Absolute value does not exceed 0.05 MMT C.

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The following section includes a brief description of the methodology used to estimate changes in soil, biomass and DOM C stocks for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Biomass C stock changes for palustrine and estuarine marshes are estimated for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands on lands below the elevation of high tides (taken to be mean high water spring tide elevation) within the U.S. Land Representation according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2006, 2010, and 2016 NOAA C-CAP surveys. C-CAP areas are calculated at the state/territory level and summed according to climate zone to national values. Publicly-owned and privately-owned lands are represented. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets. The C-CAP database provides peer reviewed country-specific mapping to support IPCC Approach 3 quantification of coastal wetland distribution, including conversion to and from open water. Biomass C stocks are not sensitive to soil organic content but are

differentiated based on climate zone. Non-forested aboveground biomass C stock data are derived from a national assessment combining field plot data and aboveground biomass mapping by remote sensing (Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). The aboveground biomass C stock for estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a meta-analysis by Lu and Megonigal (2017⁶⁷; Table 6-61). Aboveground biomass C stock data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment of a C stock to a disaggregation of a community class. Root to shoot ratios from the Wetlands Supplement were used to account for belowground biomass, which were multiplied by the aboveground C stock (Table 6-62; IPCC 2014). Above- and belowground values were summed to obtain total biomass C stocks. Conversion to open water results in emissions of all biomass C stocks during the year of conversion; therefore, emissions are calculated by multiplying the C-CAP derived area of vegetated coastal wetlands lost that year in each climate zone by its mean biomass.

Dead Organic Matter

Dead organic matter (DOM) C stocks, which include litter and dead wood stocks for subtropical estuarine forested wetlands, are an emission from Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands across all years in the time series. Data on DOM C stocks are not currently available for either palustrine or estuarine scrub/shrub wetlands for any climate zone. Data for estuarine forested wetlands in other climate zones are not included since there is no estimated loss of these forests to unvegetated open water coastal wetlands across any year based on C-CAP data. For subtropical estuarine forested wetlands, Tier 1 estimates of mangrove DOM were used (IPCC 2014). Trends in land cover change are derived from the NOAA C-CAP dataset and extrapolated to cover the entire 1990 through 2021 time series. Conversion to open water results in emissions of all DOM C stocks during the year of conversion; therefore, emissions are calculated by multiplying the C-CAP derived area of vegetated coastal wetlands lost that year by its Tier 1 DOM C stock.

Soil Carbon Stock Changes

Soil C stock changes are estimated for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands. Country-specific soil C stocks were updated in 2018 based upon analysis of an assembled dataset of 1,959 cores from across the conterminous United States (Holmquist et al. 2018). This analysis demonstrated that it was not justified to stratify C stocks based upon mineral or organic soil classification, climate zone, or wetland classes; therefore, a single soil C stock of 270 t C ha⁻¹ was applied to all classes. Following the Tier 1 approach for estimating CO₂ emissions with extraction provided within the Wetlands Supplement, soil C loss with conversion of Vegetated Coastal Wetlands to Unvegetated Open Water Coastal Wetlands is assumed to affect soil C stock to one-meter depth (Holmquist et al. 2018) with all emissions occurring in the year of wetland conversion, and multiplied by activity data of vegetated coastal wetland area converted to unvegetated open water wetlands. The methodology follows Eq. 4.6 in the Wetlands Supplement.

Soil Methane Emissions

A Tier 1 assumption has been applied that salinity conditions are unchanged and hence CH₄ emissions are assumed to be zero with conversion of Vegetated Coastal Wetlands to Unvegetated Open Water Coastal Wetlands.

Uncertainty

Underlying uncertainties in estimates of soil and biomass C stock changes are associated with country-specific (Tier 2) literature values of these stocks, while the uncertainties with the Tier 1 estimates are associated with subtropical estuarine forested wetland DOM stocks. Assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data are also included in this uncertainty

⁶⁷ See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed October 2022.

assessment. The IPCC default assumption of 1 m of soil erosion with anthropogenic activities was adopted to provide standardization in U.S. tidal C accounting (Holmquist et al. 2018). This depth of potentially erodible tidal wetland soil has not been comprehensively addressed since most soil cores analyzed were shallow (e.g., less than 50 cm) and do not necessarily reflect the depth to non-wetland soil or bedrock (Holmquist et al. 2018). Uncertainty specific to coastal wetlands include differentiation of palustrine and estuarine community classes, which determines the soil C stock applied. Because mean soil and biomass C stocks for each available community class are in a fairly narrow range, the same overall uncertainty was assigned to each (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). For aboveground biomass C stocks, the mean standard error was very low and largely influenced by the uncertainty associated with the estimated map area (Byrd et al. 2018). Uncertainty for root to shoot ratios, which are used for quantifying belowground biomass, are derived from the Wetlands Supplement. Uncertainty for subtropical estuarine forested wetland DOM stocks was derived from those listed for the Tier 1 estimates (IPCC 2014). Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (+/-10 to 15 percent; IPCC 2003). The combined uncertainty was calculated by summing the squared uncertainty for each individual source (C-CAP, soil, biomass, and DOM) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-67 for each subcategory (i.e., soil C, biomass C, and DOM emissions). The combined uncertainty across all subcategory is 32.0 percent above and below the estimate of 1.5 MMT CO_2 Eq, which is driven by the uncertainty in the soil C estimates. In 2021, the total C flux was 1.5 MMT CO_2 Eq., with lower and upper estimates of 1.0 and 2.0 MMT CO_2 Eq.

Table 6-67: Approach 1 Quantitative Uncertainty Estimates for CO₂ Flux Occurring within Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands in 2020 (MMT CO₂ Eq. and Percent)

	2021 Flux	Uncertainty Range Relative to Flux Estimate				
Source	Estimate (MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)		
		Lower	Upper	Lower	Upper	
		Bound	Bound	Bound	Bound	
Biomass C Stock	0.06	0.05	0.08	-24.1%	24.1%	
Dead Organic Matter C Stock	0.0005	0.000	0.001	-25.8%	25.8%	
Soil C Stock	1.5	1.3	1.7	-15.0%	15.0%	
Total Flux	1.5	1.0	2.0	-32.0%	32.0%	

Note: Totals may not sum due to independent rounding.

QA/QC and Verification

Data provided by NOAA (i.e., National LiDAR Dataset, NOS Tide Data, and C-CAP land cover and land cover change mapping) undergo internal agency QA/QC procedures. Acceptance of final datasets into archive and dissemination are contingent upon assurance that the data product is compliant with mandatory NOAA QA/QC requirements (McCombs et al. 2016). QA/QC and Verification of the soil C stock dataset have been provided by the Smithsonian Environmental Research Center and by the Coastal Wetlands project team leads who reviewed the estimates against primary scientific literature. Biomass C stocks are derived from peer-review literature and reviewed by the U.S. Geological Survey prior to publishing, by the peer-review process during publishing, and by the Coastal Wetland Inventory team leads before inclusion in the Inventory. For subtropical estuarine forested wetlands, Tier 1 estimates of mangrove DOM were used (IPCC 2014). Land cover estimates were assessed to ensure that the total land area did not change over the time series in which the inventory was developed, and were verified by a second QA team. A team of two evaluated and verified there were no computational errors within the calculation worksheets.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forest Land Remaining Forest Land. The resulting change in emissions and removals was negligible (±0.0001 MMT CO₂ Eq.) and did not affect whether a given year was a source or sink.

Planned Improvements

The depth of soil C affected by conversion of vegetated coastal wetlands converted to unvegetated coastal wetlands will be updated from the IPCC default assumption of 1 m of soil erosion when mapping and modeling advancements can quantitatively improve accuracy and precision. Improvements are underway to address this, first conducting a review of literature publications. Until the time where these more detailed and spatially distributed data are available, the IPCC default assumption that the top 1 m of soil is disturbed by anthropogenic activity will be applied. This is a longer-term improvement.

More detailed research is in development that provides a longer-term assessment and more highly refined rates of wetlands loss across the Mississippi Delta (e.g., Couvillion et al. 2016). The Mississippi Delta is the largest extent of coastal wetlands in the United States. Higher resolution imagery analysis would improve quantification of conversation to open water, which occurs not only at the edge of the marsh but also within the interior. Improved mapping could provide a more refined regional Approach 2-3 land representation to support the national-scale assessment provided by C-CAP.

An approach for calculating the fraction of remobilized coastal wetland soil C returned to the atmosphere as CO₂ is currently under review and may be included in future reports.

Research by USGS is investigating higher resolution mapping approaches to quantify conversion of coastal wetlands is also underway. Such approaches may form the basis for a full Approach 3 land representation assessment in future years. C-CAP data harmonization with the National Land Cover Dataset (NLCD) will be incorporated into a future iteration of the Inventory.

Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands

Open water within the U.S. land base, as described in Section 6.1 Representation of the U.S. Land Base, is recognized as Coastal Wetlands within this Inventory. The appearance of vegetated tidal wetlands on lands previously recognized as open water reflects either the building of new vegetated marsh through sediment accumulation or the transition from other lands uses through an intermediary open water stage as flooding intolerant plants are displaced and then replaced by wetland plants. Biomass, DOM and soil C accumulation on Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands begins with vegetation establishment.

Within the United States, conversion of Unvegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands is predominantly due to engineered activities, which include active restoration of wetlands (e.g., wetlands restoration in San Francisco Bay), dam removals or other means to reconnect sediment supply to the nearshore (e.g., Atchafalaya Delta, Louisiana, Couvillion et al. 2011). Wetland restoration projects have been ongoing in the United States since the 1970s. Early projects were small, a few hectares in size. By the 1990s, restoration projects, each hundreds of hectares in size, were becoming common in major estuaries. In several coastal areas e.g., San Francisco Bay, Puget Sound, Mississippi Delta and south Florida, restoration activities are in planning and implementation phases, each with the goal of recovering tens of thousands of hectares of wetlands.

In 2021, 2,406 ha of unvegetated open water coastal wetlands were converted to vegetated coastal wetlands across all wetland types and climates, which has steadily increased over the reporting period (Table 6-59). This

Throughout the reporting period, the amount of Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands has increased over time, reflecting the increase in engineered restoration activities mentioned above.

Table 6-68: CO₂ Flux from C Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (MMT CO₂ Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass C Flux	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Dead Organic Matter C Flux	(+)	(+)	0	0	0	0	0
Soil C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total C Stock Change	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq.

Notes: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Table 6-69: CO₂ Flux from C Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (MMT C)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass C Flux	(0.01)	(0.02)	(0.03)	(0.03)	(0.03)	(0.03)	(0.03)
Dead Organic Matter C Flux	(+)	(+)	0	0	0	0	0
Soil C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total C Stock Change	(0.01)	(0.02)	(0.03)	(0.03)	(0.03)	(0.03)	(0.03)

⁺ Absolute value does not exceed 0.005 MMT C.

Notes: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The following section includes a brief description of the methodology used to estimate changes in soil, biomass and DOM C stocks, and CH₄ emissions for Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Quantification of regional coastal wetland biomass C stock changes for palustrine and estuarine marsh vegetation are presented for Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands on lands below the elevation of high tides (taken to be mean high water spring tide elevation) according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2005, 2011, and 2016 NOAA C-CAP surveys. C-CAP areas are calculated at the state/territory level and summed according to climate zone to national values. Privately-owned and publicly-owned lands are represented. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets (Table 6-58). C-CAP provides peer reviewed high resolution -level mapping of coastal wetland distribution, including conversion to and from open water. Biomass C stock is not sensitive to soil organic content but differentiated based on climate zone. Data for non-forested wetlands are derived from a national assessment combining field plot data and aboveground biomass mapping by

remote sensing (Table 6-61; Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). The aboveground biomass C stock for subtropical estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a meta-analysis by Lu and Megonigal (2017⁶⁸). Aboveground biomass C stock data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment of a C stock to a disaggregation of a community class. Root to shoot ratios from the Wetlands Supplement were used to account for belowground biomass, which were multiplied by the aboveground C stock (Table 6-62; IPCC 2014). Above- and belowground values were summed to obtain total biomass C stocks.

Conversion of open water to Vegetated Coastal Wetlands results in the establishment of a standing biomass C stock; therefore, stock changes that occur are calculated by multiplying the C-CAP derived area gained that year in each climate zone by its mean biomass. While the process of revegetation of unvegetated open water wetlands can take many years to occur, it is assumed in the calculations that the total biomass is reached in the year of conversion.

Dead Organic Matter

Dead organic matter (DOM) C stocks, which include litter and dead wood stocks, are included for subtropical estuarine forested wetlands for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands across all years. Tier 1 default or country-specific data on DOM are not currently available for either palustrine or estuarine scrub/shrub wetlands for any climate zone. Data for estuarine forested wetlands in other climate zones are not included since there is no estimated loss of these forests to unvegetated open water coastal wetlands across any year based on C-CAP data. Tier 1 estimates of subtropical estuarine forested wetland DOM were used (IPCC 2014). Trends in land cover change are derived from the NOAA C-CAP dataset and extrapolated to cover the entire 1990 through 2021 time series. Dead organic matter removals are calculated by multiplying the C-CAP derived area gained that year by its Tier 1 DOM C stock. Similar to biomass C stock gains, gains in DOM can take many years to occur, but for this analysis, the total DOM stock is assumed to accumulate during the first year of conversion.

Soil Carbon Stock Change

Soil C stock changes are estimated for Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands. Country-specific soil C removal factors associated with soil C accretion, stratified by climate zones and wetland classes, are derived from a synthesis of peer-reviewed literature and updated this year based upon refined review of the dataset (Lynch 1989; Orson et al. 1990; Kearny & Stevenson 1991; Roman et al. 1997; Craft et al. 1998; Orson et al. 1998; Merrill 1999; Hussein et al. 2004; Church et al. 2006; Koster et al. 2007; Callaway et al. 2012 a & b; Bianchi et al. 2013; Crooks et al. 2014; Weston et al. 2014; Villa & Mitsch 2015; Marchio et al. 2016; Noe et al. 2016). Soil C stock changes are stratified based upon wetland class (Estuarine, Palustrine) and subclass (Emergent Marsh, Scrub Shrub). For soil C stock change, no differentiation is made for soil type (i.e., mineral, organic). Soil C removal factors were developed from literature references that provided soil C removal factors disaggregated by climate region and vegetation type by salinity range (estuarine or palustrine) as identified using NOAA C-CAP as described above (see Table 6-63 for values).

Tier 2 level estimates of C stock changes associated with annual soil C accumulation in Vegetated Coastal Wetlands were developed using country-specific soil C removal factors multiplied by activity data on Unvegetated Coastal Wetlands converted to Vegetated Coastal Wetlands. The methodology follows Eq. 4.7, Chapter 4 of the Wetlands Supplement, and is applied to the area of Unvegetated Coastal Wetlands converted to Vegetated Coastal Wetlands on an annual basis.

⁶⁸ See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed September 2022.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 642 of 1050 PageID 4090

Soil Methane Emissions

A Tier 1 assumption has been applied that salinity conditions are unchanged and hence CH₄ emissions are assumed to be zero with conversion of Vegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands.

Uncertainty

Underlying uncertainties in estimates of soil and biomass C stock changes include uncertainties associated with country-specific (Tier 2) literature values of these C stocks, assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data. Uncertainty specific to coastal wetlands include differentiation of palustrine and estuarine community classes that determines the soil C stock applied. Because mean soil and biomass C stocks for each available community class are in a fairly narrow range, the same overall uncertainty was applied to each, respectively (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). For aboveground biomass C stocks, the mean standard error was very low and largely influenced by error in estimated map area (Byrd et al. 2018). Uncertainty for root to shoot ratios, which are used for quantifying belowground biomass (Table 6-62), are derived from the *Wetlands Supplement*. Uncertainty for subtropical estuarine forested wetland DOM stocks were derived from those listed for the Tier 1 estimates (IPCC 2014). Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (±10 to 15 percent; IPCC 2003). The combined uncertainty was calculated by summing the squared uncertainty for each individual source (C-CAP, soil, biomass, and DOM) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-70 for each subcategory (i.e., soil C, biomass C and DOM emissions). The combined uncertainty across all subsources is 33.4 percent above and below the estimate of -0.1 MMT CO_2 Eq. In 2021, the total C flux was -0.1 MMT CO_2 Eq., with lower and upper estimates of -0.1 and -0.07 MMT CO_2 Eq.

Table 6-70: Approach 1 Quantitative Uncertainty Estimates for C Stock Changes Occurring within Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands in 2021 (MMT CO₂ Eq. and Percent)

Source	2021 Flux Estimate (MMT CO ₂ Eq.)	Uncertainty Range (MMT CO ₂ Eq.)		Relative to Flux Estimate (%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Biomass C Stock Flux	(0.1)	(0.12)	(0.08)	-20.0%	20.0%
Dead Organic Matter C Stock Flux	0	0	0	-25.8%	25.8%
Soil C Stock Flux	(0.007)	(0.008)	(0.005)	-18.78%	18.1%
Total Flux	(0.1)	(0.14)	(0.07)	-33.8%	33.8%

Notes: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

QA/QC and Verification

NOAA provided data (i.e., National LiDAR Dataset, NOS Tide Data, and C-CAP land cover and land cover change mapping), which undergo internal agency QA/QC assessment procedures. Acceptance of final datasets into the archive for dissemination are contingent upon assurance that the product is compliant with mandatory NOAA QA/QC requirements (McCombs et al. 2016). QA/QC and Verification of soil C stock dataset has been provided by the Smithsonian Environmental Research Center and Coastal Wetlands project team leads who reviewed the summary tables against primary scientific literature. Aboveground biomass C reference stocks are derived from an analysis by the Blue Carbon Monitoring project and reviewed by U.S. Geological Survey prior to publishing, the peer-review process during publishing, and the Coastal Wetland Inventory team leads before inclusion in the inventory. Root to shoot ratios and DOM data are derived from peer-reviewed literature and undergo review as

per IPCC methodology. Land cover estimates were assessed to ensure that the total land area did not change over the time series in which the inventory was developed and verified by a second QA team. A team of two evaluated and verified there were no computational errors within calculation worksheets. Two biogeochemists at the USGS, also members of the NASA Carbon Monitoring System Science Team, corroborated the simplifying assumption that where salinities are unchanged CH₄ emissions are constant with conversion of Unvegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forests Remaining Forests. The resulting change in emissions and removals was negligible (±0.0001 MMT CO₂ Eq.) and did not affect whether a given year was a source or sink.

Planned Improvements

Administered by the Smithsonian Environmental Research Center, the Coastal Wetland Carbon Research Coordination Network has established a U.S. country-specific database of published data quantifying soil C stock and biomass in coastal wetlands. Reference values for soil and biomass C stocks will be updated as new data emerge. Refined error analysis combining land cover change, soil and biomass C stock estimates will be updated at those times.

The USGS is investigating higher resolution mapping approaches to quantify conversion of coastal wetlands. Such approaches may form the basis for a full Approach 3 land representation assessment in future years. C-CAP data harmonization with the National Land Cover Dataset (NLCD) will be incorporated into a future iteration of the inventory.

N₂O Emissions from Aquaculture in Coastal Wetlands

Shrimp and fish cultivation in coastal areas increases nitrogen loads resulting in direct emissions of N₂O. Nitrous oxide is generated and emitted as a byproduct of the conversion of ammonia (contained in fish urea) to nitrate through nitrification and nitrate to N2 gas through denitrification (Hu et al. 2012). Nitrous oxide emissions can be readily estimated from data on fish production (IPCC 2014).

Aquaculture production in the United States has fluctuated slightly from year to year, with resulting N2O emissions between 0.1 and 0.2 MMT CO₂ Eq. between 1990 and 2021 (Table 6-71). Aquaculture production data were updated through 2019; data through 2021 are not yet available and in this analysis are held constant with 2019 emissions of 0.2 MMT CO₂ Eq. (0.5 Kt N₂O).

Table 6-71: N₂O Emissions from Aquaculture in Coastal Wetlands (MMT CO₂ Eq. and kt N₂O)

Year	1990	2005	2017	2018	2019	2020	2021
Emissions (MMT CO ₂ Eq.)	0.1	0.2	0.1	0.1	0.1	0.1	0.1
Emissions (kt N ₂ O)	0.4	0.6	0.5	0.5	0.5	0.5	0.5

Methodology and Time-Series Consistency

The methodology to estimate N₂O emissions from Aquaculture in Coastal Wetlands follows the Tier 1 guidance in the Wetlands Supplement by applying country-specific fisheries production data and the IPCC Tier 1 default emission factor.

Each year NOAA Fisheries document the status of U.S. marine fisheries in the annual report of Fisheries of the United States (National Marine Fisheries Service 2022), from which activity data for this analysis is derived.⁶⁹ The fisheries report has been produced in various forms for more than 100 years, primarily at the national level, on U.S. recreational catch and commercial fisheries landings and values. In addition, data are reported on U.S. aquaculture production, the U.S. seafood processing industry, imports and exports of fish-related products, and domestic supply and per capita consumption of fisheries products. Within the aguaculture chapter, the mass of production for catfish, striped bass, tilapia, trout, crawfish, salmon and shrimp are reported. While some of these fisheries are produced on land and some in open water cages within coastal wetlands, all have data on the quantity of food stock produced, which is the activity data that is applied to the IPCC Tier 1 default emissions factor to estimate emissions of N₂O from aquaculture. It is not apparent from the data as to the amount of aquaculture occurring above the extent of high tides on river floodplains. While some aquaculture occurs on coastal lowland floodplains, this is likely a minor component of tidal aquaculture production because of the need for a regular source of water for pond flushing. The estimation of N₂O emissions from aquaculture is not sensitive to salinity using IPCC approaches, and as such, the location of aquaculture ponds within the boundaries of coastal wetlands does not influence the calculations.

Other open water shellfisheries for which no food stock is provided, and thus no additional N inputs, are not applicable for estimating N2O emissions (e.g., clams, mussels, and oysters) and have not been included in the analysis. The IPCC Tier 1 default emissions factor of 0.00169 kg N₂O-N per kg of fish/shellfish produced is applied to the activity data to calculate total N₂O emissions.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Uncertainty estimates are based upon the Tier 1 default 95 percent confidence interval provided in Table 4.15, chapter 4 of the Wetlands Supplement for N₂O emissions and on expert judgment of the NOAA Fisheries of the United States fisheries production data. Given the overestimate of fisheries production from coastal wetland areas due to the inclusion of fish production in non-coastal wetland areas, this is a reasonable initial first approximation for an uncertainty range.

Uncertainty estimates for N₂O emissions from aquaculture production are presented in Table 6-72 for N₂O emissions. The combined uncertainty is 116 percent above and below the estimate of 0.13 MMT CO₂ Eq. In 2021, the total flux was 0.13 MMT CO₂ Eq., with lower and upper estimates of 0.00 and 0.29 MMT CO₂ Eq.

Table 6-72: Approach 1 Quantitative Uncertainty Estimates for N₂O Emissions from Aquaculture Production in Coastal Wetlands in 2021 (MMT CO₂ Eq. and Percent)

	2021 Emissions Estimate	Uncertainty Range Relative to Emissions E				
Source	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(9	%)	
		Lower	Upper	Lower	Upper	
		Bound	Bound	Bound	Bound	
Combined Uncertainty for N ₂ O Emissions						
for Aquaculture Production in Coastal Wetlands	0.13	0.00	0.29	-116%	116%	

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

⁶⁹ See https://www.fisheries.noaa.gov/resource/document/fisheries-united-states-2019-report; accessed August 2021.

QA/QC and Verification

NOAA provided internal QA/QC review of reported fisheries data. The Coastal Wetlands Inventory team consulted with the Coordinating Lead Authors of the Coastal Wetlands chapter of the *Wetlands Supplement* to assess which fisheries production data to include in estimating emissions from aquaculture. It was concluded that N₂O emissions estimates should be applied to any fish production to which food supplement is supplied be they pond or coastal open water and that salinity conditions were not a determining factor in production of N₂O emissions.

Recalculations Discussion

A NOAA report was released in 2022 that contains updated fisheries data through 2019 and the 2019 production estimate was revised from 308,550 to 298,336 MT, although it did not affect the resulting emissions (National Marine Fisheries Service 2022). The updated production value was applied for 2019, and the 2019 value was applied in 2020 and 2021. This resulted in a slight reduction of N_2O emissions by 0.01 MMT CO_2 Eq. (0.02 kt N_2O), a 3.3 percent decrease, for 2018 and 2019 compared to the previous Inventory.

In addition, the EPA updated the global warming potential (GWP) for calculating CO_2 -equivalent emissions of N_2O (from 298 to 265) to reflect the 100-year GWP provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC Fourth Assessment Report (AR4). This update was applied across the entire time series. The net result of this change was an average annual decrease of 0.02 MMT CO_2 Eq.in N_2O emissions from aquaculture for the 1990-2020 period. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Together, the combined net effect of implementing these two recalculations was an average annual decrease in N_2O emissions from aquaculture of 13.4 percent from 1990 through 2020 compared to the previous Inventory.

Flooded Land Remaining Flooded Land

Flooded lands are defined as water bodies where human activities have 1) caused changes in the amount of surface area covered by water, typically through water level regulation (e.g., constructing a dam), 2) waterbodies where human activities have changed the hydrology of existing natural waterbodies thereby altering water residence times and/or sedimentation rates, in turn causing changes to the natural emission of greenhouse gases, and 3) waterbodies that have been created by excavation, such as canals, ditches and ponds (IPCC 2019). Flooded lands include waterbodies with seasonally variable degrees of inundation, but these waterbodies would be expected to retain some inundated area throughout the year under normal conditions.

Flooded lands are broadly classified as "reservoirs" or "other constructed waterbodies" (IPCC 2019). Other constructed waterbodies include canals/ditches and ponds (flooded land <8 ha surface area). Reservoirs are defined as flooded land greater than 8 ha. IPCC guidance (IPCC 2019) provides default emission factors for reservoirs, ponds, and canals/ditches.

Land that has been flooded for greater than 20 years is defined as Flooded Land Remaining Flooded Land and land flooded for 20 years or less is defined as Land Converted to Flooded Land. The distinction is based on literature reports that CH₄ and CO₂ emissions are high immediately following flooding, but decline to a steady background level approximately 20 years after flooding (Abril et al. 2005, Barros et al. 2011, Teodoru et al. 2012). Emissions of CH₄ are estimated for Flooded Land Remaining Flooded Land, but CO₂ emissions are not included as they are primarily the result of decomposition of organic matter entering the waterbody from the catchment or contained in inundated soils and are captured in Chapter 6, Land Use, Land-Use Change, and Forestry.

Nitrous oxide emissions from flooded lands are largely related to input of organic or inorganic nitrogen from the watershed. These inputs from runoff/leaching/deposition are largely driven by anthropogenic activities such as land-use change, wastewater disposal or fertilizer application in the watershed or application of fertilizer or feed in aquaculture. These emissions are not included here to avoid double-counting of N₂O emissions which are captured

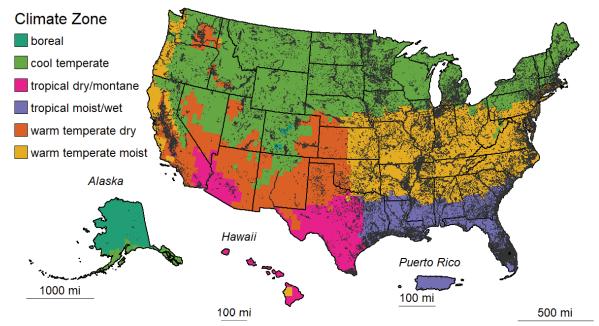
in other source categories, such as indirect N₂O emissions from managed soils (Section 5.4, Agricultural Soil Management)) and wastewater management (Section 7.2, Wastewater Treatment and Discharge).

Emissions from Flooded Land Remaining Flooded Land-Reservoirs

Reservoirs are designed to store water for a wide range of purposes including hydropower, flood control, drinking water, and irrigation. The permanently wetted portion of reservoirs are typically surrounded by periodically inundated land referred to as a "drawdown zone" or "inundation area." Greenhouse gas emissions from inundation areas are considered significant and similar per unit area to the emissions from the water surface and are therefore included in the total reservoir surface area when estimating greenhouse gas emissions from flooded land. Lakes converted into reservoirs without substantial changes in water surface area or water residence times are not considered to be managed flooded land (see Area Estimates below) (IPCC 2019).

In 2021, the United States and Puerto Rico hosted 9.7 million hectares of reservoir surface area in the Flooded Land Remaining Flooded Land category (see Methodology and Time-Series Consistency below for calculation details). These reservoirs are distributed across all six of the aggregated climate zones used to define flooded land emission factors (Figure 6-10) (IPCC 2019).

Figure 6-10: U.S. Reservoirs (black polygons) in the Flooded Land Remaining Flooded Land Category in 2021.



Note: Colors represent climate zone used to derive IPCC default emission factors.

Methane is produced in reservoirs through the microbial breakdown of organic matter. Per unit area, CH_4 emission rates tend to scale positively with temperature and system productivity (i.e., abundance of algae), but negatively with system size (i.e., depth, surface area). Methane produced in reservoirs can be emitted from the reservoir surface or exported from the reservoir when CH_4 -rich water passes through the dam. This exported CH_4 can be released to the atmosphere as the water passes through hydropower turbines or the downstream river channel. Methane emitted to the atmosphere via this pathway is referred to as "downstream emissions."

Table 6-73 and Table 6-74 below summarize nationally aggregated CH₄ emissions from reservoirs. The increase in CH₄ emissions through the time series is attributable to reservoirs matriculating from the Land Converted to Flooded Land category into the Flooded Land Remaining Flooded Land category.

Table 6-73: CH₄ Emissions from Flooded Land Remaining Flooded Land—Reservoirs (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emission	25.9	26.4	26.5	26.5	26.5	26.5	26.5
Downstream Emission	2.3	2.4	2.4	2.4	2.4	2.4	2.4
Total	28.2	28.8	28.9	28.9	28.9	28.9	28.9

Note: Totals may not sum to due independent rounding.

Table 6-74: CH₄ Emissions from Flooded Land Remaining Flooded Land —Reservoirs (kt CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emission	924	943	946	946	946	948	948
Downstream Emission	83	85	85	85	85	85	85
Total	1,007	1,028	1,032	1,032	1,032	1,033	1,033

Methane emissions from reservoirs in Texas, Florida, and Louisiana (Figure 6-11, Table 6-75) compose 33 percent of national CH₄ emissions from reservoirs in 2021. Emissions from these states are particularly high due to 1) the large expanse of reservoirs in these states (Table 6-78) and 2) the high CH₄ emission factor for the tropical dry/montane and topical moist climate zones which encompass a majority of the flooded land area in these states (Figure 6-11, Table 6-76).

Methane emissions from reservoirs in Flooded Land Remaining Flooded Land increased 2.5 percent from 1990 to 2021 due to the matriculation of reservoirs in Land Converted to Flooded Land to Flooded Land Remaining Flooded

Figure 6-11: Total CH₄ Emissions (Downstream + Surface) from Reservoirs in Flooded Land Remaining Flooded Land in 2021 (kt CH₄)

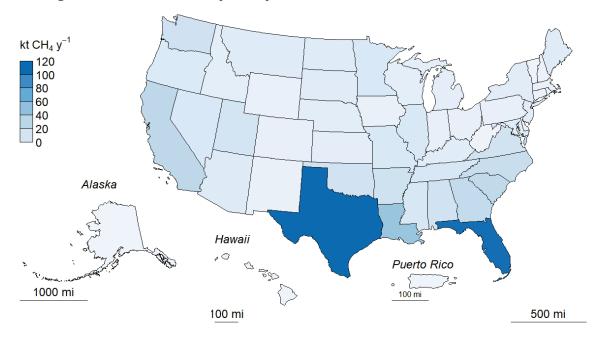


Table 6-75: Surface and Downstream CH₄ Emissions from Reservoirs in Flooded Land Remaining Flooded Land in 2021 (kt CH₄)

State	Surface	Downstream	Total
Alabama	24	2	26
Alaska	1	+	1
Arizona	15	1	16
Arkansas	26	2	28
California	39	4	43
Colorado	6	1	7
Connecticut	3	+	3
Delaware	3	+	3
District of Columbia	+	+	+
Florida	126	11	137
Georgia	35	3	38
Hawaii	1	+	1
Idaho	10	1	10
Illinois	17	2	19
Indiana	6	1	6
lowa	6	1	6
Kansas	9	1	9
Kentucky	13	1	14
Louisiana	59	5	65
Maine	13	1	15
Maryland	13	1	14
Massachusetts	5	+	5
Michigan	9	1	9
Minnesota	9 17	2	9 18
	19	2	20
Mississippi	19 17	2	20 19
Missouri			
Montana	14	1	15
Nebraska	11	1	12
Nevada	17	2	18
New Hampshire	3	+	3
New Jersey	11	1	12
New Mexico	5	+	6
New York	12	1	14
North Carolina	32	3	35
North Dakota	14	1	15
Ohio	6	1	7
Oklahoma	24	2	26
Oregon	16	1	17
Pennsylvania	6	1	6
Puerto Rico	+	+	+
Rhode Island	1	+	1
South Carolina	37	3	40
South Dakota	13	1	14
Tennessee	18	2	20
Texas	128	11	139
Utah	22	2	24
Vermont	2	+	2
Virginia	24	2	26
Washington	25	2	27
West Virginia	2	+	2
Wisconsin	10	1	11
Wyoming	5	+	5

⁺ Indicates values less than 0.5 kt

Methodology and Time-Series Consistency

Estimates of CH₄ emission for reservoirs in Flooded Land Remaining Flooded Land follow the Tier 1 methodology in the 2019 Refinement to the 2006 IPCC Guidelines (IPCC 2019). Methane emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and a climate-specific emission factor (Table 6-76). Downstream emissions are calculated as 9 percent of the surface emission (Tier 1 default). Total CH₄ emissions from reservoirs are calculated as the sum of surface and downstream emissions. National emissions are calculated as the sum of state emissions.

The IPCC default surface emission factors used in the Tier 1 methodology are derived from model-predicted (G-res model, Prairie et al. 2017) emission rates for all reservoirs in the Global Reservoir and Dam (GRanD) database (Lehner et al. 2011). Predicted emission rates were aggregated by the 11 IPCC climate zones (IPCC 2019, Table 7A.2) which were collapsed into six climate zones using a regression tree approach. All six aggregated climate zone are present in the United States.

Table 6-76: IPCC (2019) Default CH₄ Emission Factors for Surface Emission from Reservoirs in Flooded Land Remaining Flooded Land

Climate	Surface emission factor (MT CH ₄ ha ⁻¹ y ⁻¹)
Boreal	0.0136
Cool Temperate	0.054
Warm Temperate Dry	0.1509
Warm Temperate Moist	0.0803
Tropical Dry/Montane	0.2837
Tropical Moist/Wet	0.1411

Note: downstream CH₄ emissions are calculated as 9 percent of surface emissions. Downstream emissions are not calculated for CO₂.

Area estimates

U.S. reservoirs were identified from the NHDWaterbody layer in the National Hydrography Dataset Plus V2 (NHD)⁷⁰, the National Inventory of Dams (NID)⁷¹, the National Wetlands Inventory (NWI)⁷², and the Navigable Waterways (NW) network⁷³. The NHD only covers the conterminous U.S., whereas the NID, NW and NWI also include Alaska, Hawaii, and Puerto Rico.

Waterbodies in the NHDWaterbody layer that were greater than or equal to 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered reservoirs: 1) the waterbody was classified as "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to a nearby NID feature (between 100 m to 1000 m).

EPA assumes that all features included in the NW network are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. Navigable Waterway features greater than 8 ha in surface area are defined as reservoirs.

NWI features were considered "managed" if they had a Special Modifier value indicating the presence of management activities (Figure 6-12). To be included in the flooded lands inventory, the managed flooded land had

⁷⁰ See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

⁷¹ See https://nid.sec.usace.army.mil.

⁷² See https://www.fws.gov/program/national-wetlands-inventory/data-download

⁷³ See https://hifld-geoplatform.opendata.arcgis.com/maps/aaa3767c7d2b41f69e7528f99cf2fb76 0/about

to be wet or saturated for at least one season per year (see 'Water Regime' in Figure 6-12). NWI features that met these criteria, were greater than 8 ha in surface area, and were not a canal/ditch (see Emissions from Land Converted to Flooded Land – Other Constructed Waterbodies) were defined as reservoirs.

Surface areas for identified flooded lands were taken from the NHD, NWI or NW. If features from the NHD, NWI, or NW datasets overlapped, duplicated areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

Reservoir age was determined by assuming the waterbody was created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the waterbody was greater than 20-years old throughout the time series.

Figure 6-12: Selected Features from NWI that Meet Flooded Lands Criteria

MODIFIERS In order to more adequately describe the wetland and deepwater habitats, one each of the water regime, water chemistry, soil, or special modifiers may be applied at the class or lower level in the hierarchy.									
	Water Regi	ime	Special Modifiers	Water Chemistr	у	Soil			
A Temporarily Flooded B Seasonally Saturated C Seasonally Flooded N Re	rregularly Exposed Regularly Flooded regularly Flooded	Freshwater Tidal Q Regularly Flooded-Fresh Tidal R Seasonally Flooded-Fresh Tidal S Temporarily Flooded-Fresh Tidal T Semipermanently Flooded-Fresh Tidal V Permanently Flooded-Fresh Tidal	f Farmed m Managed h Diked/Impounded r Artificial Substrate	Halinity/Salinity 1 Hyperhaline / Hypersaline 2 Euhaline / Eusaline 3 Mixohaline / M ixosaline (Brackish) 4 Polyhaline 5 Mesohaline 6 Oligohaline 0 Fresh	pH Modifiers for Fresh Water a Acid t Circumneutral i Alkaline	g Organic n Mineral			

Must also meet one selected special modifier (red box) to be included in the flooded lands inventory

Included in the flooded lands inventory if it meets water regime qualifier (gold box) Source (modified): https://www.fws.gov/sites/default/files/documents/wetlands-and-deepwater-map-code-diagram.pdf

IPCC (2019) allows for the exclusion of managed waterbodies from the inventory if the water surface area or residence time was not substantially changed by the construction of the dam. The guidance does not quantify what constitutes a "substantial" change, but here EPA excludes the U.S. Great Lakes from the inventory based on expert judgment that neither the surface area nor water residence time was substantially altered by their associated dams.

Reservoirs were disaggregated by state (using boundaries from the 2016 U.S. Census Bureau⁷⁴) and climate zone. Downstream and surface emissions for cross-state reservoirs were allocated to states based on the surface area that the reservoir occupied in each state. Only the U.S. portion of reservoirs that cross country borders were included in the inventory.

The surface area of reservoirs in Flooded Land Remaining Flooded Land increased by approximately 4 percent from 1990 to 2021 (Table 6-77) due to reservoirs matriculating into Flooded Land Remaining Flooded Land when they reached 20 years of age.

Table 6-77: National Totals of Reservoir Surface Area in Flooded Land Remaining Flooded Land (millions of ha)

Surface Area (millions of ha)	1990	2005	2017	2018	2019	2020	2021
Reservoir	9.40	9.61	9.64	9.65	9.65	9.67	9.67

⁷⁴ See https://www.census.gov/geographies/mapping-files/time-series/geo/carto-boundary-file.html.

Table 6-78: State Breakdown of Reservoir Surface Area in Flooded Land Remaining Flooded Land (millions of ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	0.24	0.24	0.24	0.24	0.24	0.24	0.24
Alaska	0.02	0.02	0.02	0.02	0.02	0.02	0.02
Arizona	0.06	0.06	0.06	0.06	0.06	0.06	0.06
Arkansas	0.29	0.30	0.30	0.30	0.30	0.30	0.30
California	0.35	0.36	0.36	0.36	0.36	0.36	0.36
Colorado	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Connecticut	0.03	0.03	0.03	0.03	0.03	0.03	0.03
Delaware	0.03	0.03	0.03	0.03	0.03	0.03	0.03
District of Columbia	+	+	+	+	+	+	+
Florida	0.88	0.89	0.89	0.89	0.89	0.89	0.89
Georgia	0.29	0.30	0.30	0.30	0.30	0.30	0.30
Hawaii	+	+	+	+	+	+	+
Idaho	0.13	0.15	0.15	0.15	0.15	0.15	0.15
Illinois	0.21	0.22	0.22	0.22	0.22	0.23	0.23
Indiana	0.06	0.07	0.07	0.07	0.07	0.07	0.07
lowa	0.07	0.08	0.08	0.08	0.08	0.08	0.08
Kansas	0.07	0.09	0.09	0.09	0.09	0.09	0.09
Kentucky	0.15	0.16	0.16	0.16	0.16	0.16	0.16
Louisiana	0.41	0.42	0.42	0.42	0.42	0.42	0.42
Maine	0.23	0.24	0.25	0.25	0.25	0.25	0.25
Maryland	0.16	0.16	0.16	0.16	0.16	0.16	0.16
Massachusetts	0.07	0.07	0.07	0.07	0.07	0.07	0.07
Michigan	0.15	0.15	0.15	0.15	0.15	0.15	0.15
Minnesota	0.30	0.31	0.31	0.31	0.31	0.31	0.31
Mississippi	0.18	0.18	0.18	0.18	0.18	0.18	0.18
Missouri	0.20	0.20	0.20	0.20	0.20	0.21	0.21
Montana	0.24	0.26	0.26	0.26	0.26	0.26	0.26
Nebraska	0.13	0.13	0.13	0.13	0.13	0.13	0.13
Nevada	0.09	0.09	0.09	0.09	0.09	0.09	0.09
New Hampshire	0.06	0.06	0.06	0.06	0.06	0.06	0.06
New Jersey	0.13	0.13	0.13	0.13	0.13	0.13	0.13
New Mexico	0.05	0.05	0.05	0.05	0.05	0.05	0.05
New York	0.21	0.21	0.21	0.21	0.21	0.21	0.21
North Carolina	0.40	0.40	0.40	0.40	0.40	0.40	0.40
North Dakota	0.25	0.25	0.25	0.25	0.25	0.25	0.25
Ohio	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Oklahoma	0.27	0.27	0.27	0.27	0.27	0.27	0.27
Oregon	0.21	0.21	0.21	0.21	0.21	0.21	0.21
Pennsylvania	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Puerto Rico	+	+	+	+	+	+	+
Rhode Island	0.02	0.02	0.02	0.02	0.02	0.02	0.02
South Carolina	0.31	0.32	0.33	0.33	0.33	0.33	0.33
South Dakota	0.24	0.24	0.24	0.24	0.24	0.24	0.24
Tennessee	0.22	0.23	0.23	0.23	0.23	0.23	0.23
Texas	0.66	0.67	0.67	0.67	0.67	0.67	0.67
Utah	0.18	0.19	0.19	0.19	0.19	0.19	0.19
Vermont	0.04	0.04	0.04	0.04	0.04	0.04	0.04
Virginia	0.30	0.30	0.30	0.30	0.30	0.30	0.30
Washington	0.26	0.26	0.26	0.26	0.26	0.26	0.26
West Virginia	0.03	0.03	0.03	0.03	0.03	0.03	0.03
Wisconsin	0.18	0.18	0.18	0.18	0.18	0.18	0.18
Wyoming	0.09	0.09	0.09	0.09	0.09	0.09	0.09
Total	9.40	9.61	9.64	9.65	9.65	9.67	9.67

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 652 of 1050 PageID 4100

+ Indicates values less than 0.005 million Ha

Note: Totals may not sum due to independent rounding.

Uncertainty

Uncertainty in estimates of CH $_4$ emissions from reservoirs in Flooded Land Remaining Flooded Land (Table 6-79) are developed using the IPCC Approach 2 and include uncertainty in the default emission factors and land areas. Uncertainty ranges for the emission factors are provided in the 2019 Refinement to the 2006 IPCC Guidelines (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD, NWI, and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in these spatial datasets are unknown, but uncertainty for remote sensing products is assumed to be \pm 10 - 15 percent based on IPCC guidance (IPCC 2003). An uncertainty range of \pm 15 percent for the reservoir area estimates is assumed and is based on expert judgment.

Table 6-79: Approach 2 Quantitative Uncertainty Estimates for CH₄ Emissions from Reservoirs in Flooded Land Remaining Flooded Land

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emissio Estimate ^a			
		(MMT CO₂ Eq.)	(MMT (CO ₂ Eq.)	(%	6)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Reservoir						
Surface	CH ₄	26.5	26.2	26.8	-1.2%	1.1%
Downstream	CH ₄	2.39	2.32	2.7	-3%	13%
Total	CH ₄	28.9	28.6	29.4	-1%	1.7%

^a Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS in collaboration with many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID. The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory (NWI). Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. *Inventory* QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

The 1990 through 2021 Inventory uses the National Wetland Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory report used the National Hydrography Data (NHD) as the primary geospatial data source. The NWI is far more detailed than the NHD, resulting in increased

emission estimates across the time series. The NWI also includes Alaska, Hawaii, and Puerto Rico which were not estimated in the 1990 through 2020 Inventory.

Emissions from reservoirs in Flooded Land Remaining Flooded Land were further increased by correcting the creation date of several large reservoirs in South Dakota, North Dakota, Alabama, Arkansas, Georgia, and South Carolina. These reservoirs were incorrectly classified as Land Converted to Flooded Land for a portion of the 1990-2020 time series, but are classified as Flooded Land Remaining Flooded Land throughout the 1990 through 2021 Inventory time series.

The 1990 through 2020 Inventory distinguished between reservoirs and inundation areas. Inundation areas were defined as periodically flooded lands that bordered a permanently flooded reservoir. The NWI includes both permanently and periodically flooded lands, but doesn't consistently discriminate between them, therefore inundation areas and reservoirs are consolidated into reservoirs for the 1990 through 2021 Inventory.

In addition, the EPA updated the global warming potential (GWP) for CH₄ (from 25 to 28) to reflect the 100-year GWP provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC Fourth Assessment Report (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations was an average annual increase in CH₄ emission estimates from reservoirs of 10.3 MMT CO₂ Eq., or 56 percent, over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

The EPA is currently measuring greenhouse gas emissions from 108 reservoirs in the conterminous United States. The survey will be complete in September 2023 and the data will be used to develop country-specific emission factors for U.S. reservoirs. At the earliest, these emission factors will be used in the 2025 Inventory submission. EPA received public comment during the Public Review period of the 1990-2021 Inventory focused on peer-review literature of surface emission rates, adjustments for trophic status/class, decommissioned dams, missing reservoirs, and other factors to consider incorporating into the analysis. As noted above, EPA's current plan is to move toward the use of country specific EFs which EPA anticipates will address some of the comments, but as an interim measure, EPA will further review and consider updates for a future Inventory based on public comment.

Emissions from Flooded Land Remaining Flooded Land-Other Constructed Waterbodies

The IPCC (IPCC 2019) provides emission factors for several types of "other constructed waterbodies" including freshwater ponds and canals/ditches. IPCC (2019) describes ponds as waterbodies that are "...constructed by excavation and/or construction of walls to hold water in the landscape for a range of uses, including agricultural water storage, access to water for livestock, recreation, and aquaculture." Furthermore, the IPCC "Decision tree for types of Flooded Land" (IPCC 2019, Fig. 7.2) defines a size threshold of 8 ha to distinguish reservoirs from "other constructed waterbodies." For this Inventory, ponds are defined as managed flooded land that are 1) less than 8 ha in surface area, and 2) not categorized as canals/ditches. IPCC (2019) further distinguishes saline versus brackish ponds, with the former supporting lower CH₄ emissions than the latter. Activity data on pond salinity are not uniformly available for the conterminous United States and all ponds in the inventory are assumed to be freshwater. Ponds often receive high organic matter and nutrient loadings, may have low oxygen levels, and are often sites of substantial CH₄ emissions from anaerobic sediments.

Canals and ditches (terms are used interchangeably) are linear water features constructed to transport water (i.e., stormwater drainage, aqueduct), to irrigate or drain land, to connect two or more bodies of water, or to serve as a waterway for watercraft. The geometry and construction of canals and ditches varies widely and includes narrow earthen channels (<1 m wide) and concrete lined aqueducts in excess of 50 m wide. Canals and ditches can be

extensive in many agricultural, forest and settlement areas, and may also be significant sources of emissions in some circumstances.

Methane emissions from freshwater ponds in Flooded Land Remaining Flooded Land increased by less than 1 percent from 1990 to 2021. Methane emissions from canals and ditches have remained constant throughout the time series because age data are not available for canals and ditches, thus they are assumed to be greater than 20-years old in 1990 and are included in Flooded Land Remaining Flooded Land throughout the time series. Overall, CH₄ emissions from other constructed waterbodies have remained fairly constant since 1990 (Table 6-80 and Table 6-81).

Table 6-80: CH₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Other Constructed Waterbodies							
Canals and Ditches	2.3	2.3	2.3	2.3	2.3	2.3	2.3
Freshwater Ponds	14.1	14.2	14.2	14.2	14.2	14.2	14.2
Total	16.4	16.5	16.5	16.5	16.5	16.5	16.5

Note: Totals may not sum due to independent rounding.

Table 6-81: CH₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land (kt CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Other Constructed Waterbodi	es						
Canals and Ditches	80.9	80.9	80.9	80.9	80.9	80.9	80.9
Freshwater Ponds	505.2	507.8	508.3	508.3	508.4	508.4	508.5
Total	586.0	588.7	589.2	589.2	589.3	589.3	589.3

Note: Totals may not sum due to independent rounding.

Florida and Louisiana have the greatest methane emissions from canals and ditches in the United States (Figure 6-13, Table 6-82). Presumably, most of these canals serve to drain the extensive wetland complexes in these states (Davis, 1973). California has the third greatest methane emissions from canals and ditches. Canals and ditches in California primarily serve to convey water from the mountains to urban and agricultural areas. Michigan and Minnesota have the fourth and fifth largest methane emissions from canals and ditches. These systems serve to drain historic wetlands to facilitate row-crop agriculture. Florida, Texas, and Georgia have the greatest methane emissions from freshwater ponds, although states throughout the eastern United States make significant contributions to the national total. These patterns of emissions are in accordance with the distribution of other constructed waterbodies in the United States.

Table 6-82: CH₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land in 2021 (kt CH₄)

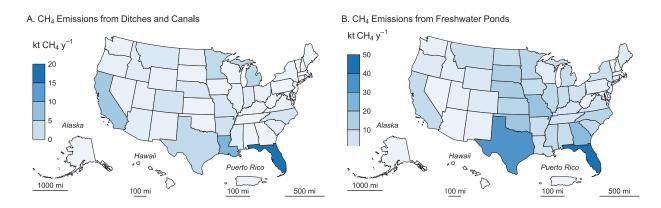
State	Canals and Ditches	Freshwater Ponds	Total
Alabama	+	12.4	12.5
Alaska	+	+	+
Arizona	1.5	1.1	2.6
Arkansas	3.1	11.4	14.5
California	7.0	13.5	20.4
Colorado	2.9	5.7	8.6
Connecticut	+	2.4	2.4
Delaware	+	1.3	1.3
District of Columbia	+	+	+
Florida	15.6	47.8	63.4
Georgia	+	26.0	26.2
Hawaii	+	+	0.6

Idaho	1.7	3.8	5.5
Illinois	1.0	14.3	15.3
Indiana	1.7	11.7	13.4
lowa	+	13.0	13.4
Kansas	+	16.3	16.4
Kentucky	+	8.3	8.5
Louisiana	9.4	8.9	18.3
Maine	+	5.6	5.6
Maryland	+	2.7	3.1
Massachusetts	+	3.2	3.2
Michigan	5.4	12.1	17.5
Minnesota	4.7	16.2	20.9
Mississippi	1.6	14.0	15.6
Missouri	2.4	23.1	25.4
Montana	2.0	12.0	14.0
Nebraska	2.0	19.6	21.6
Nevada	0.7	1.0	1.7
New Hampshire	+	1.6	1.6
New Jersey	+	4.7	5.1
New Mexico	0.8	2.4	3.2
New York	+	10.9	11.3
North Carolina	2.6	16.8	19.4
North Dakota	0.8	13.1	13.9
Ohio	0.8	9.2	10.0
Oklahoma	+	21.8	21.9
Oregon	1.0	5.5	6.5
Pennsylvania	+	4.5	4.6
Puerto Rico	+	+	+
Rhode Island	+	+	+
South Carolina	1.3	14.5	15.8
South Dakota	+	18.4	18.7
Tennessee	+	8.7	8.9
Texas	4.6	38.6	43.2
Utah	0.8	3.3	4.1
Vermont	+	1.0	1.1
Virginia	0.5	9.6	10.1
Washington	+	3.1	3.6
West Virginia	+	1.6	1.6
Wisconsin	+	4.1	4.4
Wyoming	0.9	6.0	6.8
Total	80.9	508.5	589.3

⁺ Indicates values less than 0.5 kt

Note: Totals may not sum due to independent rounding.

Figure 6-13: 2021 CH₄ Emissions from A) Ditches and Canals and B) Freshwater Ponds in Flooded Land Remaining Flooded Land (kt CH₄)



Methodology and Time-Series Consistency

Estimates of CH₄ emissions for other constructed waterbodies in Flooded Land Remaining Flooded Land follow the Tier 1 methodology in IPCC (2019). All calculations are performed at the state level and summed to obtain national estimates. Based on IPCC guidance, methane emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and an emission factor (Table 6-83). Although literature data on greenhouse gas emissions from canals and ditches is relatively sparse, they have the highest default emission factor of all flooded land types (Table 6-83). Default emission factors for freshwater ponds are on the higher end of those for reservoirs. There are insufficient data to support climate-specific emission factors for ponds or canals and ditches. Downstream emissions are not inventoried for other constructed waterbodies because 1) many of these systems are not associated with dams (e.g., excavated ponds and ditches), and 2) there are insufficient data to derive downstream emission factors for other constructed waterbodies that are associated with dams (IPCC 2019).

Table 6-83: IPCC (2019) Default CH₄ Emission Factors for Surface Emissions from Other **Constructed Waterbodies in Flooded Land Remaining Flooded Land**

	Surface emission factor
Other Constructed Waterbody	(MT CH ₄ ha ⁻¹ y ⁻¹)
Freshwater ponds	0.183
Canals and ditches	0.416

Area estimates

Other constructed waterbodies were identified from the NHDWaterbody layer in the National Hydrography Dataset Plus V2 (NHD)⁷⁵, the National Inventory of Dams (NID)⁷⁶, the National Wetlands Inventory (NWI)⁷⁷, and the Navigable Waterways (NW) network. 78 The NHD only covers the conterminous US, whereas the NID, NW and NWI also include Alaska, Hawaii, District of Columbia, and Puerto Rico. The following paragraphs present the criteria used to identify other constructed waterbodies in the NHD, NW, and NWI.

⁷⁵ See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

⁷⁶ See https://nid.sec.usace.army.mil.

⁷⁷ See https://www.fws.gov/program/national-wetlands-inventory/data-download

⁷⁸ See https://hifld-geoplatform.opendata.arcgis.com/maps/aaa3767c7d2b41f69e7528f99cf2fb76 0/about

Waterbodies in the NHDWaterbody layer that were greater than 20-years old, less than 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered freshwater ponds in Flooded Land Remaining Flooded Land: 1) the waterbody was classified "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to nearby NID feature (between 100 m to 1000 m).

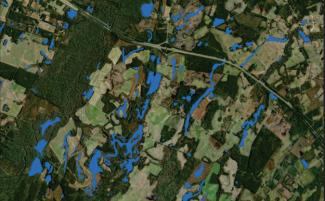
EPA assumes that all features included in the NW are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. NW features that were less than 8 ha in surface area and not identified as canals/ditch (see below) were considered freshwater ponds. Only 2.1 percent of NW features met these criteria, and they were primarily associated with larger navigable waterways, such as lock chambers on impounded rivers.

NWI features were considered "managed" if they had a special modifier value indicating the presence of management activities (Figure 6-12). To be included in the flooded lands inventory, the managed flooded land had to be wet or saturated for at least one season per year (see "Water Regime' in Figure 6-12). NWI features that met these criteria, were less than 8 ha in surface area, and were not a canal/ditch (see below) were defined as freshwater ponds.

Canals and ditches, a subset of other constructed waterbodies, were identified in the NWI by their morphology. Unlike a natural water body, canals and ditches are typically narrow, linear features with abrupt angular turns. Figure 6-14 contrasts the unique shape of ditches/canals vs more natural water features.

Figure 6-14: Left: NWI Features Identified as Canals/Ditches (pink) by Unique Narrow, Linear/Angular Morphology. Right: Non-Canal/Ditches with More Natural Morphology (blue)





This morphology was identified systematically using shape attributes in a decision tree model. A training set of 752 features were identified as either "ditch" or "not ditch" using expert judgment. The training set was used to train a decision tree which was used to categorize millions of NWI features based on three shape attribute ratios (Figure 6-12).

Table 6-84: Predictors used in Decision Tree to Identify Canal/Ditches

Shape Length: # of Shape Vertices

Shape Area: Shape Length

Shape Area: # of Shape Vertices

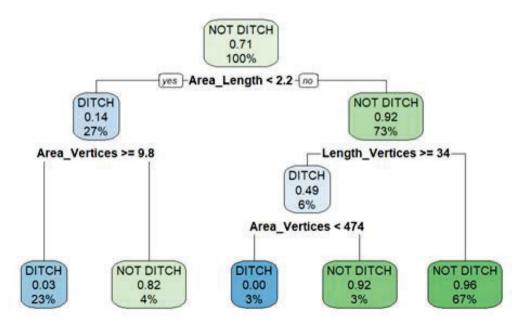
The decision tree built a model using 80 percent of the 752 training features and used the 20 percent to validate the model. The model was 93.1 percent accurate. Below are the validation results (Table 6-85).

Table 6-85: Validation Results for Ditch/Canal Classification Decision Tree

		ruth
Prediction	Ditch/Canal	Not Ditch/Canal
Ditch/Canal	49	5
Not Ditch/Canal	8	27

The decision tree model was then applied to the entire NWI dataset using the following shape attribute ratios (Figure 6-15).

Figure 6-15: Structure of Decision Tree Used to Identify Canals/Ditches



Surface areas for other constructed waterbodies were taken from NHD, NWI or the NW. If features from the NHD, NWI, or the NW datasets overlapped, these areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

The age of other constructed waterbody features was determined by assuming the waterbody was created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the waterbody was greater than 20-years old throughout the time series. No canal/ditch features were associated with a nearby dam, therefore all canal/ditch features were assumed to be greater than 20-years old through the time series.

For the year 2021, this Inventory contains 2,778,529 ha of freshwater ponds and 194,412 ha of canals and ditches in Flooded Land Remaining Flooded Land (Table 6-86). The surface area of freshwater ponds increased by 18,069 Ha (0.6 percent) from 1990 to 2021 due to flooded lands matriculating from Land Converted to Flooded Land to Flooded Land Remaining Flooded Land. All canals and ditches were assumed to be greater than 20-years old throughout the time series, thus the surface area of these flooded lands is constant throughout the time series.

Table 6-86: National Surface Area Totals in Flooded Land Remaining Flooded Land - Other Constructed Waterbodies (ha)

	1990	2005	2017	2018	2019	2020	2021
Canals and ditches	194,412	194,412	194,412	194,412	194,412	194,412	194,412
Freshwater ponds	2,760,460	2,775,096	2,777,613	2,777,854	2,778,136	2,778,394	2,778,529
Total	2,954,871	2,969,508	2,972,024	2,972,266	2,972,548	2,972,805	2,972,941

Note: Totals may not sum due to independent rounding.

Canals and ditches in the conterminous United States are most abundant in the Gulf Coast states and California (Figure 6-16A, Table 6-87). Florida contains 20 percent of all U.S. canal and ditch surface area, most of which were constructed in the early 1900s for drainage, flood protection, and water storage purposes. Freshwater ponds are more widely distributed across the United States (Figure 6-16B, Table 6-88). Florida also has the greatest surface area of freshwater ponds, equivalent to 9 percent of all freshwater pond surface area in the United States.

Figure 6-16: 2021 Surface Area of A) Ditches and Canals and B) Freshwater Ponds in Flooded Land Remaining Flooded Land (hectares)

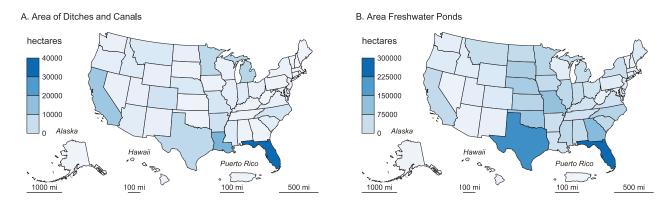


Table 6-87: State Totals of Surface Area in Flooded Land Remaining Flooded Land— Canals and Ditches (ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	228	228	228	228	228	228	228
Alaska	115	115	115	115	115	115	115
Arizona	3,536	3,536	3,536	3,536	3,536	3,536	3,536
Arkansas	7,349	7,349	7,349	7,349	7,349	7,349	7,349
California	16,725	16,725	16,725	16,725	16,725	16,725	16,725
Colorado	6,874	6,874	6,874	6,874	6,874	6,874	6,874
Connecticut	28	28	28	28	28	28	28
Delaware	130	130	130	130	130	130	130
District of Columbia	1	1	1	1	1	1	1
Florida	37,482	37,482	37,482	37,482	37,482	37,482	37,482
Georgia	352	352	352	352	352	352	352
Hawaii	538	538	538	538	538	538	538
Idaho	4,027	4,027	4,027	4,027	4,027	4,027	4,027
Illinois	2,489	2,489	2,489	2,489	2,489	2,489	2,489
Indiana	4,064	4,064	4,064	4,064	4,064	4,064	4,064
lowa	867	867	867	867	867	867	867
Kansas	258	258	258	258	258	258	258
Kentucky	672	672	672	672	672	672	672
Louisiana	22,565	22,565	22,565	22,565	22,565	22,565	22,565
Maine	56	56	56	56	56	56	56
Maryland	967	967	967	967	967	967	967

Massachusetts	132	132	132	132	132	132	132
Michigan	12,897	12,897	12,897	12,897	12,897	12,897	12,897
Minnesota	11,235	11,235	11,235	11,235	11,235	11,235	11,235
Mississippi	3,936	3,936	3,936	3,936	3,936	3,936	3,936
Missouri	5,670	5,670	5,670	5,670	5,670	5,670	5,670
Montana	4,740	4,740	4,740	4,740	4,740	4,740	4,740
Nebraska	4,864	4,864	4,864	4,864	4,864	4,864	4,864
Nevada	1,587	1,587	1,587	1,587	1,587	1,587	1,587
New Hampshire	103	103	103	103	103	103	103
New Jersey	944	944	944	944	944	944	944
New Mexico	2,002	2,002	2,002	2,002	2,002	2,002	2,002
New York	925	925	925	925	925	925	925
North Carolina	6,321	6,321	6,321	6,321	6,321	6,321	6,321
North Dakota	1,819	1,819	1,819	1,819	1,819	1,819	1,819
Ohio	1,819	1,819	1,819	1,819	1,819	1,819	1,819
Oklahoma	278	278	278	278	278	278	278
Oregon	2,498	2,498	2,498	2,498	2,498	2,498	2,498
Pennsylvania	143	143	143	143	143	143	143
Puerto Rico	249	249	249	249	249	249	249
Rhode Island	1	1	1	1	1	1	1
South Carolina	3,226	3,226	3,226	3,226	3,226	3,226	3,226
South Dakota	703	703	703	703	703	703	703
Tennessee	442	442	442	442	442	442	442
Texas	11,152	11,152	11,152	11,152	11,152	11,152	11,152
Utah	1,875	1,875	1,875	1,875	1,875	1,875	1,875
Vermont	95	95	95	95	95	95	95
Virginia	1,306	1,306	1,306	1,306	1,306	1,306	1,306
Washington	1,125	1,125	1,125	1,125	1,125	1,125	1,125
West Virginia	28	28	28	28	28	28	28
Wisconsin	887	887	887	887	887	887	887
Wyoming	2,086	2,086	2,086	2,086	2,086	2,086	2,086
Total	194,412	194,412	194,412	194,412	194,412	194,412	194,412

Table 6-88: State Totals of Surface Area in Flooded Land Remaining Flooded Land—Freshwater Ponds (ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	67,304	67,639	67,655	67,658	67,658	67,658	67,658
Alaska	2,449	2,456	2,456	2,456	2,456	2,456	2,456
Arizona	6,153	6,199	6,208	6,211	6,211	6,215	6,215
Arkansas	62,194	62,510	62,510	62,510	62,510	62,510	62,510
California	73,388	73,589	73,647	73,647	73,653	73,659	73,660
Colorado	30,871	31,143	31,157	31,167	31,167	31,168	31,168
Connecticut	13,001	13,055	13,058	13,058	13,058	13,058	13,058
Delaware	7,006	7,010	7,010	7,010	7,010	7,010	7,010
District of Columbia	22	22	22	22	22	22	22
Florida	261,027	261,150	261,191	261,191	261,195	261,195	261,195
Georgia	140,246	142,014	142,090	142,090	142,093	142,099	142,099
Hawaii	2,229	2,236	2,238	2,238	2,238	2,238	2,238
Idaho	20,678	20,780	20,781	20,781	20,781	20,781	20,781
Illinois	77,370	77,913	77,985	78,001	78,006	78,016	78,016
Indiana	63,427	63,918	64,003	64,006	64,011	64,011	64,011
Iowa	67,833	69,748	70,668	70,749	70,911	71,023	71,096
Kansas	87,134	89,134	89,189	89,202	89,209	89,215	89,231
Kentucky	44,788	45,164	45,189	45,189	45,189	45,189	45,189
Louisiana	48,756	48,884	48,889	48,889	48,889	48,894	48,894

Maine	30,645	30,694	30,703	30,703	30,703	30,703	30,703
Maryland	14,739	14,890	14,942	14,942	14,942	14,944	14,945
Massachusetts	17,327	17,386	17,425	17,432	17,438	17,444	17,446
Michigan	66,159	66,310	66,342	66,347	66,347	66,355	66,355
Minnesota	88,283	88,509	88,585	88,592	88,599	88,622	88,634
Mississippi	76,062	76,212	76,230	76,230	76,235	76,240	76,241
Missouri	125,673	125,955	125,970	125,970	125,971	125,972	125,972
Montana	65,130	65,484	65,506	65,506	65,510	65,510	65,510
Nebraska	105,741	106,970	107,124	107,177	107,189	107,211	107,219
Nevada	5,641	5,644	5,680	5,690	5,690	5,694	5,694
New Hampshire	8,744	8,769	8,780	8,780	8,780	8,780	8,781
New Jersey	25,780	25,782	25,782	25,782	25,782	25,782	25,782
New Mexico	13,020	13,025	13,025	13,025	13,025	13,025	13,025
New York	59,452	59,707	59,811	59,811	59,813	59,813	59,816
North Carolina	91,555	91,608	91,613	91,613	91,613	91,613	91,613
North Dakota	71,758	71,763	71,784	71,784	71,784	71,784	71,784
Ohio	49,844	50,177	50,340	50,351	50,365	50,391	50,406
Oklahoma	119,199	119,310	119,310	119,310	119,312	119,313	119,313
Oregon	29,950	29,958	29,960	29,967	29,967	29,967	29,967
Pennsylvania	24,724	24,740	24,749	24,749	24,749	24,749	24,749
Puerto Rico	851	851	851	851	851	851	851
Rhode Island	2,521	2,529	2,536	2,536	2,536	2,536	2,536
South Carolina	78,075	78,748	78,960	78,961	78,972	78,976	78,976
South Dakota	100,444	100,661	100,713	100,714	100,732	100,733	100,736
Tennessee	46,824	47,525	47,546	47,555	47,560	47,567	47,567
Texas	210,149	210,711	210,721	210,721	210,721	210,721	210,721
Utah	17,817	17,871	17,882	17,882	17,882	17,884	17,884
Vermont	5,692	5,705	5,709	5,709	5,709	5,709	5,709
Virginia	52,327	52,327	52,327	52,327	52,327	52,327	52,327
Washington	17,013	17,058	17,081	17,081	17,081	17,081	17,081
West Virginia	8,902	8,932	8,938	8,938	8,938	8,938	8,938
Wisconsin	22,037	22,181	22,189	22,189	22,189	22,189	22,189
Wyoming	32,508	32,540	32,554	32,554	32,554	32,554	32,554
Total	2,760,460	2,775,096	2,777,613	2,777,854	2,778,136	2,778,394	2,778,529

Uncertainty

Uncertainty in estimates of CH₄ emissions from other constructed waterbodies (ponds, canals/ditches) in Flooded Land Remaining Flooded Land (Table 6-89) are estimated using IPCC Approach 2 and include uncertainty in the default emission factors and the flooded land area inventory. Uncertainty in default emission factors is provided in the 2019 Refinement to the 2006 IPCC Guidelines (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD, NWI, and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in these spatial datasets are unknown, but uncertainty for remote sensing products is assumed to be \pm 10 - 15 percent based on IPCC guidance (IPCC 2003). An uncertainty range of \pm 15 percent for the flooded land area estimates is assumed and is based on expert judgment.

Table 6-89: Approach 2 Quantitative Uncertainty Estimates for CH₄ Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a							
		(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(9	%)				
			Lower Bound	Upper Bound	Lower Bound	Upper Bound				
Canals and ditches	CH ₄	2.3	2.1	2.4	-5.3%	7%				
Freshwater pond	CH_4	14.2	14.2	14.2	-0.04%	0.04%				
Total	CH ₄	16.5	16.4	16.7	-0.7%	1%				

^aRange of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS in collaboration many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID. The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory (NWI). Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. *Inventory* QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of *2006 IPCC Guidelines* (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

The 1990 through 2021 Inventory uses the National Wetland Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory used the National Hydrography Data (NHD as the primary geospatial data source. The NWI is far more detailed than the NHD and also includes Alaska, Hawaii, and Puerto Rico which were missing from 1990 through 2020 Inventory.

In addition, the EPA updated the global warming potential (GWP) for calculating CO₂-equivalent emissions of CH₄ (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations was an average annual increase in CH_4 emission estimates from constructed waterbodies of 15.4 MMT CO_2 Eq., or a factor of 15.3, over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

Default emission factors for canals/ditches were derived from a global dataset that include few measurements from U.S. systems. The EPA plans to conduct a literature survey to determine if sufficient data are available to derive a country-specific emission factor.

Canal and ditch surface area included here may overlap with ditches and canals included in CH₄ emission estimates for ditches draining inland organic soils (IPCC 2013, section 2.2.2.1). EPA plans to reconcile ditch/canal surface areas between the two managed land types (flooded land vs. drained inland organic soils) in the next (i.e., 1990 through 2022) Inventory.

⁷⁹ See https://www.epa.gov/national-aquatic-resource-surveys/national-lakes-assessment-2017-quality-assurance-project-plan.

Features less than 8 ha in the NW that were not identified as Canal/Ditch were defined as freshwater ponds. Many of these features are lock chambers connected to an upstream reservoir. These systems likely have emission rates more similar to a reservoir than freshwater pond. In the 1990 through 2022 Inventory these systems will be classified as reservoirs.

Land Converted to Wetlands (CRF 6.9 **Source Category 4D2)**

Emissions and Removals from Land Converted to Vegetated Coastal Wetlands

Land Converted to Vegetated Coastal Wetlands occurs as a result of inundation of unprotected low-lying coastal areas with gradual sea-level rise, flooding of previously drained land behind hydrological barriers, and through active restoration and creation of coastal wetlands through removal of hydrological barriers. Based upon NOAA C-CAP, wetlands are subdivided into freshwater (Palustrine) and saline (Estuarine) classes and further subdivided into emergent marsh, scrub shrub and forest classes All other land categories (i.e., Forest Land, Cropland, Grassland, Settlements and Other Lands) are identified as having some area converting to Vegetated Coastal Wetlands. This inventory does not include Land Converted to Unvegetated Open Water Coastal Wetlands (see Planned Improvements section below). Between 1990 and 2021 the rate of annual transition for Land Converted to Vegetated Coastal Wetlands ranged from 0 to 2,650 ha per year, depending on the type of land converted.⁸⁰ Conversion rates from Forest Land were relatively consistent between 1990 and 2010 (ranging between 2,409 and 2,650 ha) and decreased to 625 ha starting in 2011; the majority of these conversions resulted in increases in the area of palustrine wetlands, which also initiates CH₄ emissions when lands are inundated with fresh water.⁸¹ Little to no conversion of Cropland, Grassland, Settlement, or Other Lands to vegetated coastal wetlands occurred during the reporting period, with converted areas ranging from 0 to 25 ha per year.82

Conversion to coastal wetlands resulted in a biomass C stock loss of 0.1 MMT CO₂ Eq. (0.03 MMT C) in 2021 (Table 6-90 and Table 6-91). Loss of forest biomass through conversion of Forest Lands to Vegetated Coastal Wetlands is the primary driver behind biomass C stock change being a source rather than a sink across the time series. Conversion of Cropland, Grassland, Settlement and Other Lands result in a net increase in biomass stocks. Conversion of lands to vegetated coastal wetlands resulted in a DOM loss of 0.03 MMT CO₂ Eq. (0.008 MMT C) in 2021 (Table 6-90 and Table 6-91), which is driven by the loss of DOM when Forest Land is converted to Vegetated Coastal Wetlands. This is likely an overestimate of loss because wetlands inherently preserve dead organic material. Conversion of Cropland, Grassland, Settlement and Other Land results in a net increase in DOM Across all time periods, soil C accumulation resulting from Lands Converted to Vegetated Coastal Wetlands is a carbon sink and has ranged between -0.15 and -0.3 MMT CO₂ Eq. (-0.04 and -0.07 MMT C; Table 6-90 and Table 6-91). Conversion of lands to coastal wetlands resulted in CH₄ emissions of 0.18 MMT CO₂ Eq. (6.4 kt CH₄) in 2021 (Table

⁸⁰ Data from C-CAP; see https://coast.noaa.gov/digitalcoast/tools/. Accessed September 2022.

⁸¹ Currently, the C-CAP dataset categorizes coastal wetlands as either palustrine (fresh water) or estuarine (presence of saline water). This classification does not differentiate between estuarine wetlands with salinity ≤ 18 ppt (when methanogenesis begins to occur) and those that are >18 ppt (where negligible to no CH₄ is produced); therefore, it is not possible at this time to account for CH₄ emissions from estuarine wetlands in the Inventory.

⁸² At the present stage of Inventory development, Coastal Wetlands are not explicitly shown in the Land Representation analysis while work continues harmonizing data from NOAA's Coastal Change Analysis Program (C-CAP) with NRI, FIA and NLDC data used to compile the Land Representation (NOAA OCM 2020).

6-92). Methane emissions due to the conversion of Lands to Vegetated Coastal Wetlands are largely the result of Forest Land converting to palustrine emergent and scrub shrub coastal wetlands in warm temperate climates. Emissions were the highest between 1990 and 2001 (0.28 MMT CO_2 Eq., 10.0 kt CH_4) and have continually decreased to current levels. This decrease was driven by a reduction in the rate of conversion of forest land to palustrine scrub-shrubs and emergent wetlands.

Table 6-90: Net CO₂ Flux from C Stock Changes in Land Converted to Vegetated Coastal Wetlands (MMT CO₂ Eq.)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Vegetated Coastal							
Wetlands	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Forest Land Converted to Vegetated							
Coastal Wetlands	0.49	0.50	(0.01)	+	0.01	0.02	0.03
Biomass C Stock	0.62	0.62	0.13	0.13	0.13	0.13	0.13
Dead Organic Matter C Flux	0.11	0.12	0.03	0.03	0.03	0.03	0.03
Soil C Stock	(0.23)	(0.24)	(0.17)	(0.16)	(0.15)	(0.14)	(0.13)
Grassland Converted to Vegetated Coastal							
Wetlands	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Other Land Converted to Vegetated							
Coastal Wetlands	(0.03)	(0.03)	(0.02)	(0.02)	(0.02)	(0.02)	(0.02)
Biomass C Stock	(0.01)	(0.02)	(0.01)	(0.01)	(0.01)	(0.01)	(0.01)
Soil C Stock	(0.01)	(0.02)	(0.02)	(0.02)	(0.02)	(0.02)	(0.02)
Settlements Converted to Vegetated							
Coastal Wetlands	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total Biomass Flux	0.60	0.60	0.12	0.12	0.12	0.12	0.12
Total Dead Organic Matter Flux	0.11	0.12	0.03	0.03	0.03	0.03	0.03
Total Soil C Flux	(0.25)	(0.25)	(0.18)	(0.18)	(0.17)	(0.16)	(0.15)
Total Flux	0.46	0.47	(0.03)	(0.02)	(0.01)	(+)	0.01

⁺ Absolute value does not exceed 0.005 MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-91: Net CO₂ Flux from C Stock Changes in Land Converted to Vegetated Coastal Wetlands (MMT C)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Vegetated Coastal							
Wetlands	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Forest Land Converted to Vegetated							
Coastal Wetlands	0.13	0.14	(+)	+	+	0.006	0.01
Biomass C Stock	0.17	0.17	0.04	0.04	0.04	0.04	0.04
Dead Organic Matter C Flux	0.03	0.03	0.01	0.01	0.01	0.01	0.01
Soil C Stock	(0.06)	(0.06)	(0.05)	(0.04)	(0.04)	(0.04)	(0.04)
Grassland Converted to Vegetated Coastal							
Wetlands	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Other Land Converted to Vegetated							
Coastal Wetlands	(0.01)	(0.01)	(0.01)	(0.01)	(0.01)	(0.01)	(0.01)

Biomass C Stock	(+)	(0.005)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Settlements Converted to Vegetated							
Coastal Wetlands	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total Biomass Flux	0.16	0.16	0.03	0.03	0.03	0.03	0.03
Total Dead Organic Matter Flux	0.03	0.03	0.01	0.01	0.01	0.01	0.01
Total Soil C Flux	(0.07)	(0.07)	(0.05)	(0.05)	(0.05)	(0.04)	(0.04)
Total Flux	0.13	0.13	(0.01)	(0.01)	(+)	(+)	+

⁺ Absolute value does not exceed 0.005 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-92: CH₄ Emissions from Land Converted to Vegetated Coastal Wetlands (MMT CO₂ Eq. and kt CH₄)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Vegetated Coastal							<u></u>
Wetlands							
CH ₄ Emissions (MMT CO ₂ Eq.)	+	+	+	+	+	+	+
CH ₄ Emissions (kt CH ₄)	+	0.01	0.04	0.04	0.04	0.05	0.05
Forest Land Converted to Vegetated							
Coastal Wetlands							
CH ₄ Emissions (MMT CO ₂ Eq.)	0.28	0.27	0.20	0.19	0.18	0.17	0.16
CH ₄ Emissions (kt CH ₄)	9.88	9.74	7.22	6.85	6.48	6.10	5.76
Grassland Converted to Vegetated Coastal							
Wetlands							
CH ₄ Emissions (MMT CO ₂ Eq.)	+	+	+	+	+	+	+
CH ₄ Emissions (kt CH ₄)	0.01	0.01	0.06	0.07	0.07	0.08	0.08
Other Land Converted to Vegetated Coastal							
Wetlands							
CH ₄ Emissions (MMT CO ₂ Eq.)	+	+	0.01	0.01	0.01	0.01	0.01
CH ₄ Emissions (kt CH ₄)	0.08	0.14	0.40	0.43	0.47	0.50	0.52
Settlements Converted to Vegetated							
Coastal Wetlands							
CH ₄ Emissions (MMT CO ₂ Eq.)	+	+	+	+	+	+	+
CH ₄ Emissions (kt CH ₄)	0.01	+	+	+	+	+	+
Total CH ₄ Emissions (MMT CO ₂ Eq.)	0.28	0.28	0.22	0.21	0.20	0.19	0.18
Total CH ₄ Emissions (kt CH ₄)	9.98	9.91	7.72	7.39	7.06	6.73	6.41

⁺ Absolute value does not exceed 0.005 MMT CO₂ Eq. or 0.005 kt CH₄.

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The following section provides a description of the methodology used to estimate changes in biomass, dead organic matter and soil C stocks and CH₄ emissions for Land Converted to Vegetated Coastal Wetlands. Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Biomass C stocks for Land Converted to Vegetated Coastal Wetlands are estimated for palustrine and estuarine marshes for land below the elevation of high tides (taken to be mean high water spring tide elevation) and as far seawards as the extent of intertidal vascular plants within the U.S. Land Representation according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2005, 2011, and 2016 NOAA C-CAP surveys (NOAA OCM 2020). Both federal and non-federal lands are represented.

Delineating Vegetated Coastal Wetlands from ephemerally flooded upland Grasslands represents a particular challenge in remote sensing. Moreover, at the boundary between wetlands and uplands, which may be gradual on low lying coastlines, the presence of wetlands may be ephemeral depending upon weather and climate cycles and as such, impacts on the emissions and removals will vary over these time frames. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets using the C-CAP change data closest in date to a given year. Biomass is not sensitive to soil organic content. Aboveground biomass C stocks for non-forested coastal wetlands are derived from a national assessment combining field plot data and aboveground biomass mapping by remote sensing (Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). Aboveground biomass C removal data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment to a disaggregation of a community class. The aboveground biomass C stock for estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a metaanalysis by Lu and Megonigal (2017⁸³). Root to shoot ratios from the Wetlands Supplement were used to account for belowground biomass, which were multiplied by the aboveground C stock (IPCC 2014) and summed with aboveground biomass to obtain total biomass carbon stocks. Aboveground biomass C stocks for Forest Land, Cropland, and Grassland that are lost with the conversion to Vegetated Coastal Wetlands were derived from Tier 1 default values (IPCC 2006; IPCC 2019). Biomass C stock changes are calculated by subtracting the biomass C stock values of each land-use category (i.e., Forest Land, Cropland, and Grassland) from those of Vegetated Coastal Wetlands in each climate zone and multiplying that value by the corresponding C-CAP derived area gained that year in each climate zone. The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion. The total coastal wetland biomass C stock change is accounted for during the year of conversion; therefore, no interannual changes are calculated during the remaining years it is in the category.

Dead Organic Matter

Dead organic matter (DOM) C stocks, which include litter and dead wood stocks, are accounted for in subtropical estuarine forested wetlands for Lands Converted to Vegetated Coastal Wetlands across all years. Tier 1 estimates of mangrove DOM C stocks were used for subtropical estuarine forested wetlands (IPCC 2014). Neither Tier 1 or 2 data on DOM are currently available for either palustrine or estuarine scrub/shrub wetlands for any climate zone or estuarine forested wetlands in climates other than subtropical climates. Tier 1 DOM C stocks for Forest Land converted to Vegetated Coastal Wetlands were derived from IPCC (2019) to account for the loss of DOM that occurs with conversion. Changes in DOM are assumed to be negligible for other land-use conversions (i.e., other than Forest Land) to coastal wetlands based on the Tier 1 method in IPCC (2006). Trends in land cover change are derived from the NOAA C-CAP dataset and extrapolated to cover the entire 1990 through 2021 time series. Dead organic matter removals are calculated by multiplying the C-CAP derived area gained that year by the difference between Tier 1 DOM C stocks for Vegetated Coastal Wetlands and Forest Land. The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion. The coastal wetland DOM stock is assumed to be in steady state once established in the year of conversion; therefore, no interannual changes are calculated.

Soil Carbon Stock Changes

Soil C removals are estimated for Land Converted to Vegetated Coastal Wetlands across all years. Soil C stock changes, stratified by climate zones and wetland classes, are derived from a synthesis of peer-reviewed literature (Lynch 1989; Orson et al. 1990; Kearny & Stevenson 1991; Roman et al. 1997; Craft et al. 1998; Orson et al. 1998; Merrill 1999; Hussein et al. 2004; Church et al. 2006; Koster et al. 2007; Callaway et al. 2012 a & b; Bianchi et al. 2013; Crooks et al. 2014; Weston et al. 2014; Villa & Mitsch 2015; Marchio et al. 2016; Noe et al. 2016). To estimate soil C stock changes, no differentiation is made for soil type (i.e., mineral, organic). Soil C removal data for

⁸³ See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed October 2021.

all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment to a disaggregation of a community class.

As per IPCC (2014) guidance, Land Converted to Vegetated Coastal Wetlands is assumed to remain in this category for up to 20 years before transitioning to Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands. Tier 2 level estimates of soil C stock changes associated with annual soil C accumulation from Land Converted to Vegetated Coastal Wetlands were developed using country-specific soil C removal factors multiplied by activity data of land area for Land Converted to Vegetated Coastal Wetlands for a given year in addition to the previous 19-year cumulative area. Guidance from the *Wetlands Supplement* allows for the rate of soil C accumulation to be instantaneously equivalent to that in natural settings and that soil C accumulation is initiated when natural vegetation becomes established; this is assumed to occur in the first year of conversion. No loss of soil C as a result of land conversion to coastal wetlands is assumed to occur. Since the C-CAP coastal wetland area dataset begins in 1996, the area converted prior to 1996 is assumed to be the same as in 1996. Similarly, the coastal wetland area data for 2017 through 2021 is assumed to be the same as in 2016. The methodology follows Eq. 4.7, Chapter 4 of the *IPCC Wetlands Supplement* (IPCC 2014) and is applied to the area of Land Converted to Vegetated Coastal Wetlands on an annual basis.

Soil Methane Emissions

Tier 1 estimates of CH₄ emissions for Land Converted to Vegetated Coastal Wetlands are derived from the same wetland map used in the analysis of wetland soil C fluxes for palustrine wetlands, and are produced from C-CAP, LiDAR and tidal data, in combination with default CH₄ emission factors provided in Table 4.14 of the *IPCC Wetlands Supplement*. The methodology follows Eq. 4.9, Chapter 4 of the *IPCC Wetlands Supplement*. Because Land Converted to Vegetated Coastal Wetlands is held in this category for up to 20 years before transitioning to Vegetated Coastal Wetlands Remaining to Vegetated Coastal Wetlands, CH₄ emissions in a given year represent the cumulative area held in this category for that year and the prior 19 years.

Uncertainty

Underlying uncertainties in estimates of soil C removal factors, biomass change, DOM, and CH₄ emissions include error in uncertainties associated with Tier 2 literature values of soil C removal estimates, biomass stocks, DOM, and IPCC default CH₄ emission factors, uncertainties linked to interpretation of remote sensing data, as well as assumptions that underlie the methodological approaches applied.

Uncertainty specific to coastal wetlands include differentiation of palustrine and estuarine community classes, which determines what flux is applied. Because mean soil and biomass C removal for each available community class are in a fairly narrow range, the same overall uncertainty was assigned to each, respectively (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). Uncertainties for CH₄ flux are the Tier 1 default values reported in the Wetlands Supplement. Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (±10 to 15 percent; IPCC 2003). However, there is significant uncertainty in salinity ranges for tidal and non-tidal estuarine wetlands and activity data used to estimate the CH₄ flux (e.g., delineation of an 18 ppt boundary), which will need significant improvement to reduce uncertainties. The combined uncertainty was calculated by summing the squared uncertainty for each individual source (C-CAP, soil, biomass, and DOM) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-93 for each carbon pool and the CH_4 emissions. The combined uncertainty is 42.6 percent above and below the estimate of 0.17 MMT CO_2 Eq. In 2021, the total flux was 0.17 MMT CO_2 Eq., with lower and upper estimates of 0.10 and 0.24 MMT CO_2 Eq.

Table 6-93: Approach 1 Quantitative Uncertainty Estimates for C Stock Changes occurring within Land Converted to Vegetated Coastal Wetlands in 2021 (MMT CO₂ Eq. and Percent)

Sauras	2021 Estimate	Uncert	ainty Range	Relative to E	stimatea	
Source	(MMT CO₂ Eq.)	(MMT	CO ₂ Eq.)	(%)		
		Lower	Upper	Lower	Upper	
		Bound	Bound	Bound	Bound	
Biomass C Stock Flux	0.12	0.1	0.15	-20.0%	20.0%	
Dead Organic Matter Flux	0.03	0.02	0.03	-25.8%	25.8%	
Soil C Stock Flux	(0.15)	(0.2)	(0.1)	-18.7%	18.7%	
Methane Emissions	0.18	0.13	0.18	-29.9%	29.9%	
Total Uncertainty	0.18	0.11	0.26	-42.6%	42.6%	

^a Range of flux estimates based on error propagation at 95 percent confidence interval.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

QA/QC and Verification

NOAA provided National LiDAR Dataset, tide data, and C-CAP land cover and land cover change mapping, all of which are subject to agency internal mandatory QA/QC assessment (McCombs et al. 2016). QA/QC and verification of soil C stock dataset has been provided by the Smithsonian Environmental Research Center and Coastal Wetland Inventory team leads. Biomass C stocks are derived from peer-review literature, reviewed by U.S. Geological Survey prior to publishing, by the peer-review process during publishing, and by the Coastal Wetland Inventory team leads prior to inclusion in the inventory and from IPCC reports. As a QC step, a check was undertaken confirming that Coastal Wetlands recognized by C-CAP represent a subset of Wetlands recognized by the NRI for marine coastal states. A team of two evaluated and verified there were no computational errors within the calculation worksheets. Soil C stock, emissions/removals data are based upon peer-reviewed literature and CH₄ emission factors are derived from the *Wetlands Supplement*.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since, states classified as wet temperate, cold temperate and mediterranean climate zones fall under the category of *Land Converted to Forest Land*.

In addition, EPA updated the global warming potential (GWP) for calculating CO₂-equivalent emissions of CH₄ (from 25 to 28) to reflect the 100-year GWP values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWP values provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

As a result of these changes, the recalculations resulted in net average increases to emissions totals ranging from $0.03~MMT~CO_2~Eq.$ to $0.02~MMT~CO_2~Eq.$ across the 1990 through 2020 time series compared to the previous Inventory.

Planned Improvements

Administered by the Smithsonian Environmental Research Center, the Coastal Wetland Carbon Research Coordination Network has established a U.S. country-specific database of soil C stocks and biomass for coastal wetlands. 84 This dataset will be updated periodically. Refined error analysis combining land cover change and C

⁸⁴ See https://serc.si.edu/coastalcarbon; accessed August 2021.

stock estimates will be provided as new data are incorporated. Through this work, a model is in development to represent changes in soil C stocks and will be incorporated into the next (i.e., 2024) Inventory submission.

Currently, the only coastal wetland conversion that is reported in the Inventory is Lands Converted to Vegetated Coastal Wetlands. The next (2024) submission will include C stock change data for Lands Converted to Unvegetated Open Water Coastal Wetlands.

Land Converted to Flooded Land

Flooded lands are defined as water bodies where human activities have 1) caused changes in the amount of surface area covered by water, typically through water level regulation (e.g., constructing a dam), 2) waterbodies where human activities have changed the hydrology of existing natural waterbodies thereby altering water residence times and/or sedimentation rates, in turn causing changes to the natural production of greenhouse gases, and 3) waterbodies that have been created by excavation, such as canals, ditches and ponds (IPCC 2019). Flooded lands include waterbodies with seasonally variable degrees of inundation but would be expected to retain some inundated area throughout the year under normal conditions.

Flooded lands are broadly classified as "reservoirs" or "other constructed waterbodies" (IPCC 2019). Reservoirs are defined as flooded land greater than 8 ha and includes the seasonally flooded land on the perimeter of permanently flooded land (i.e., inundation areas). IPCC guidance (IPCC 2019) provides default emission factors for reservoirs and several types of "other constructed waterbodies" including freshwater ponds and canals/ditches.

Land that has been flooded for 20 years or greater is defined as Flooded Land Remaining Flooded Land and land flooded for less than 20 years is defined as Land Converted to Flooded Land. The distinction is based on literature reports that CO₂ and CH₄ emissions are high immediately following flooding as labile organic matter is rapidly degraded but decline to a steady background level approximately 20 years after flooding (Abril et al. 2005, Barros et al. 2011, Teodoru et al. 2012). Both CO₂ and CH₄ emissions are estimated for Land Converted to Flooded Land.

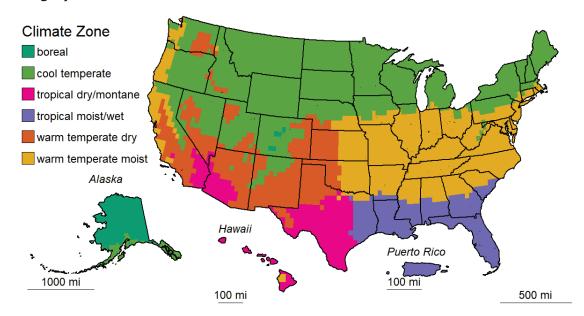
Nitrous oxide emissions from flooded lands are largely related to inputs of organic or inorganic nitrogen from the watershed. These inputs from runoff/leaching/deposition are largely driven by anthropogenic activities such as land-use change, wastewater disposal or fertilizer application in the watershed or application of fertilizer or feed in aquaculture. These emissions are not included here to avoid double-counting N_2O emissions which are captured in other source categories, such as indirect N_2O emissions from managed soils (Section 5.4, Agricultural Soil Management) and wastewater management (Section 7.2, Wastewater Treatment and Discharge).

Emissions from Land Converted to Flooded Land–Reservoirs

Reservoirs are designed to store water for a wide range of purposes including hydropower, flood control, drinking water, and irrigation. The permanently wetted portion of reservoirs are typically surrounded by periodically inundated land referred to as a "drawdown zone" or "inundation area." Greenhouse gas emissions from inundation areas are considered significant and similar per unit area to the emissions from the water surface and are therefore included in the total reservoir surface area when estimating greenhouse gas emissions from flooded land. Lakes converted into reservoirs without substantial changes in water surface area or water residence times are not considered to be managed flooded land (see Area Estimates below) (IPCC 2019).

In 2021, the United States and Puerto Rico contained 63,804 hectares of reservoir surface area in Land Converted to Flooded Land (see Methodology and Time-Series Consistency below for calculation details) distributed across all six of the aggregated climate zones used to define flooded land emission factors (Figure 6-17) (IPCC 2019).

Figure 6-17: U.S. Reservoirs (black polygons) in the Land Converted to Flooded Land Category in 2021



Note: Colors represent climate zone used to derive IPCC default emission factors. Reservoirs (indicated by black polygons) are sparsely distributed across United States, but can be seen in IL, IN, and OH in this image.

Methane and CO₂ are produced in reservoirs through the natural breakdown of organic matter. Per unit area emission rates tend to scale positively with temperature and system productivity (i.e., abundance of algae). Greenhouse gases produced in reservoirs can be emitted directly from the water surface and inundation areas or as greenhouse gas-enriched water passes through the dam and the downstream river. Sufficient information exists to estimate downstream CH₄ emissions using Tier 1 IPCC guidance (IPCC 2019), but no guidance is provided for downstream CO₂ emissions. Table 6-94 and Table 6-95 below summarize nationally aggregated CH₄ and CO₂ emissions from reservoirs in Land Converted to Flooded Land. The decrease in CO₂ and CH₄ emissions through the time series is attributable to reservoirs matriculating from the Land Converted to Flooded Land category into the Flooded Land Remaining Flooded Land Category. Emissions have been stable since 2005, reflecting the low rate of new flooded land creation over the past 16 years.

Table 6-94: CH₄ Emissions from Land Converted to Flooded Land - Reservoirs (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emissions	0.9	0.2	0.2	0.2	0.2	0.2	0.2
Downstream Emissions	0.1	+	+	+	+	+	+
Total	1.0	0.2	0.3	0.3	0.3	0.2	0.2

+Indicates values less than 0.05 MMT CO_2

Note: Totals may not sum due to independent rounding

Table 6-95: CH₄ Emissions from Land Converted to Flooded Land—Reservoirs (kt CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emissions	34	8	8	8	8	6	6
Downstream Emissions	3	1	1	1	1	1	1
Total	37	9	9	9	9	6	6

Table 6-96: CO₂ Emissions from Land Converted to Flooded Land—Reservoirs (MMT CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoir	1.3	0.3	0.4	0.4	0.4	0.2	0.2

Table 6-97: CO₂ Emissions from Land Converted to Flooded Land—Reservoirs (MMT C)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoir	0.4	0.1	0.1	0.1	0.1	0.1	0.1

Methane and CO_2 emissions from reservoirs in Minnesota were 8-fold greater than from any other state (Figure 6-18 and Table 6-98). This is attributed to ten reservoirs created in Minnesota after 2001 which impound 52,252 ha of water, 99 percent of which is located in Mille Lacs Lake. North Dakota is the second largest source of CO_2 and CH_4 from reservoirs in Land Converted to Flooded Land. Ninety-five percent of Land Converted to Flooded Land reservoir surface area in North Dakota is attributed to Devils Lake. Both Mille Lacs and Devils Lakes are natural waterbodies provisioned with dams for water level management.

Figure 6-18: 2021 A) CH₄ and B) CO₂ Emissions from U.S. Reservoirs in Land Converted to Flooded Land

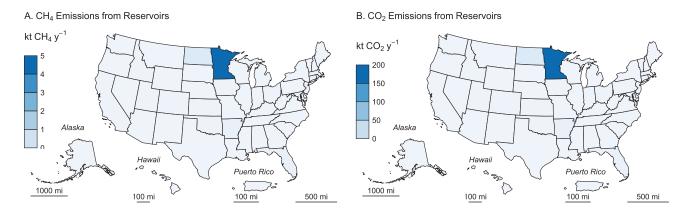


Table 6-98: Methane and CO₂ Emissions from Reservoirs in Land Converted to Flooded Land in 2021 (kt CH₄; kt CO₂)

<u> </u>		CH ₄		CO ₂ ^a
State	Surface	Downstream	Total	Surface
Alabama	0	0	0	0
Alaska	0	0	0	0
Arizona	0	0	0	0
Arkansas	+	+	+	6
California	+	+	+	+
Colorado	+	+	+	1
Connecticut	+	+	+	+
Delaware	0	0	0	0
District of Columbia	0	0	0	0
Florida	+	+	+	5
Georgia	+	+	+	+
Hawaii	0	0	0	0
Idaho	+	+	+	2

Indiana	Illinois	+	+	+	+
Iowa					
Kansas					
Kentucky 0 0 0 0 Louisiana 0 0 0 0 Maine + + + + + Maryland + + + + + + Misryland +					
Louisiana 0 0 0 0 0 0 Maine + + + + + + + + + + + + + + + + + + +					_
Maine + + + + + H <td>,</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td>	,	-	-	-	-
Maryland + + + + + + A M Minassachusetts +		-	-	-	
Massachusetts + <					
Michigan + + + + + + + + + + + + + Minimesota 4 + + 5 195 195 195 Minimesota + + + 5 195 195 Minimesota 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 <	•				
Minnesota 4 + 5 195 Mississippi 0 0 0 0 0 0 Missouri 0 0 0 0 0 0 Montana + + + + + + + + + + + + + + + + + +					-
Missouri 0 0 0 0 0 0 0 0 Missouri 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	-				
Missouri 0 0 0 0 Montana +					
Montana + </td <td></td> <td></td> <td>-</td> <td>-</td> <td></td>			-	-	
Nebraska +<		_	0	-	-
Nevada + + + + + + + + + + + + New Hampshire 0					
New Hampshire 0 0 0 0 New Jersey 0 0 0 0 New Mexico + + + + New York + + + + North Carolina 0 0 0 0 North Dakota 1 + 1 23 Ohio + + + 1 23 Ohio + + + + 1 1 23 Ohio + + + + 1 2 3 Ohio + + + + 1 1 - 1 - 1 - 1 - 1 - - - - 0		+	+	+	+
New Jersey 0 0 0 0 New Mexico + 1 23 Oo					
New Mexico + 1 23 Ool Ool		0	0	0	-
New York + + + + + + + North Carolina 0		0	0	0	0
North Carolina 0 0 0 0 North Dakota 1 + 1 23 Ohio + + + 1 23 Ohio + + + + 1 1 1 1 1 1 1 23 1 1 1 1 23 2 2 2 2 2 3 0		+	+	+	+
North Dakota		+	+	+	+
Ohio + + + + 1 Oklahoma + + + + 2 Oregon 0 0 0 0 0 Pennsylvania + + + + + + + Pennsylvania +	North Carolina	0	0	0	0
Oklahoma + + + + 2 Oregon 0 0 0 0 0 Pennsylvania + + + + + + + Puerto Rico 0	North Dakota	1	+	1	23
Oregon 0 0 0 0 Pennsylvania + + + + + + Puerto Rico 0 0 0 0 0 0 Rhode Island 0 0 0 0 0 0 South Carolina 0 0 0 0 0 0 South Dakota + <td>Ohio</td> <td>+</td> <td>+</td> <td>+</td> <td>1</td>	Ohio	+	+	+	1
Pennsylvania	Oklahoma	+	+	+	2
Puerto Rico 0 0 0 0 Rhode Island 0 0 0 0 South Carolina 0 0 0 0 South Dakota + + + + + Tennessee + + + + 1 Texas + + + + + Utah + + + + 1 Vermont 0 0 0 0 0 Virginia 0 0 0 0 0 Washington + + + + + Wisconsin + + + + +	Oregon	0	0	0	0
Rhode Island 0 0 0 0 0 0 0 South Carolina 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Pennsylvania	+	+	+	+
South Carolina 0 0 0 0 South Dakota + + + + + Tennessee + + + + 1 Texas + + + + + + Utah + + + + 1 + 1 + + 1 + + + + + 1 +	Puerto Rico	0	0	0	0
South Dakota + + + + + + Tennessee +	Rhode Island	0	0	0	0
Tennessee + + + + + 1 Texas + + + + + + + + + + + + + + + + + + +	South Carolina	0	0	0	0
Texas + + + + + + + 1 Utah + + + + + 1 Vermont 0 0 0 0 0 Virginia 0 0 0 0 Washington + + + + + + + + + West Virginia 0 0 0 0 0 Wisconsin + + + + + + +	South Dakota	+	+	+	+
Utah + + + + 1 Vermont 0 0 0 0 Virginia 0 0 0 0 Washington + + + + West Virginia 0 0 0 0 Wisconsin + + + +	Tennessee	+	+	+	1
Vermont 0 0 0 0 Virginia 0 0 0 0 Washington + + + + West Virginia 0 0 0 0 Wisconsin + + + +	Texas	+	+	+	+
Virginia 0 0 0 0 Washington + + + + West Virginia 0 0 0 0 Wisconsin + + + +	Utah	+	+	+	1
Washington + + + + + West Virginia 0 0 0 0 Wisconsin + + + + +	Vermont	0	0	0	0
West Virginia 0 0 0 0 Wisconsin + + + + +	Virginia	0	0	0	0
West Virginia 0 0 0 0 Wisconsin + + + + +	Washington	+	+	+	+
Wisconsin + + + + +		0	0	0	0
Wyoming + + + + +	_	+	+	+	+
	Wyoming	+	+	+	+

⁺ Indicates values greater than zero and less than 0.5 kt

Methodology and Time-Series Consistency

Estimates of CH_4 and CO_2 emissions for reservoirs in Land Converted to Flooded Land follow the Tier 1 methodology in the IPCC guidance (IPCC 2019). All calculations are performed at the state level and summed to obtain national estimates. Emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and a climate-specific emission factor (Table 6-99). Downstream CH_4 emissions are calculated as 9 percent of the surface CH_4 emission (Tier 1 default). The IPCC guidance (IPCC 2019) does not address downstream CO_2 emissions, presumably because there are insufficient data in the literature to estimate this emission pathway.

The IPCC default surface emission factors are derived from model-predicted (G-res model, Prairie et al. 2017) emission rates for all reservoirs in the Global Reservoir and Dam (GRanD) database (Lehner et al. 2011). Predicted emission rates were aggregated by the 11 IPCC climate zones (IPCC 2019, Table 7A.2) which were collapsed into six climate zones using a regression tree approach. All six aggregated climate zone are present in the United States.

^aCO₂: Only surface CO₂ emissions are included in the Inventory

Table 6-99: IPCC (2019) Default CH₄ and CO₂ Emission Factors for Surface Emissions from Reservoirs in Land Converted to Flooded Land

	Surface emission factor						
Climate	MT CH ₄ ha ⁻¹ y ⁻¹	MT CO₂ ha-1 y-					
Boreal	0.0277	3.45					
Cool Temperate	0.0847	3.74					
Warm Temperate Dry	0.1956	6.23					
Warm Temperate Moist	0.1275	5.35					
Tropical Dry/Montane	0.3923	10.82					
Tropical Moist/Wet	0.2516	10.16					

Note: downstream CH_4 emissions are calculated as 9 percent of surface emissions. Downstream emissions are not calculated for CO_2 .

Area Estimates

U.S. reservoirs were identified from the NHDWaterbody layer in the National Hydrography Dataset Plus V2 (NHD),⁸⁵ the National Inventory of Dams (NID),⁸⁶ the National Wetlands Inventory (NWI)⁸⁷, and the Navigable Waterways (NW) network⁸⁸. The NHD only covers the conterminous U.S., whereas the NID, NW and NWI also include Alaska, Hawaii, and Puerto Rico. The following paragraphs present the criteria used to identify other constructed waterbodies in the NHD, NW, and NWI.

Waterbodies in the NHDWaterbody layer that were less than or equal to 20-years old, greater than or equal to 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered reservoirs in Land Converted to Flooded Land: 1) the waterbody was classified "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to nearby NID feature (between 100 m to 1000 m).

EPA assumes that all features included in the NW are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. NW features greater than 8 ha in surface area are defined as reservoirs.

NWI features were considered "managed" if they had a special modifier value indicating the presence of management activities (Figure 6-19). To be included in the flooded lands inventory, the managed flooded land had to be wet or saturated for at least one season per year (see 'Water Regime' in Figure 6-19). NWI features that met these criteria, were greater than 8 Ha in surface area, and were not a canal/ditch (see Emissions from Land Converted to Flooded Land – Other Constructed Waterbodies) were defined as reservoirs.

Surface areas for identified flooded lands were taken from NHD, NWI or the NW. If features from the NHD, NWI, or the NW datasets overlapped, duplicate areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

Reservoir age was determined by assuming they were created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the feature was greater than 20-years old

⁸⁵ See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

⁸⁶ See https://nid.sec.usace.army.mil.

⁸⁷ See https://www.fws.gov/program/national-wetlands-inventory/data-download.

⁸⁸ See https://www.census.gov/geographies/mapping-files/time-series/geo/carto-boundary-file.html.

throughout the time series. Only reservoirs less than or equal to 20-years old are included in Land Converted to Flooded Land.

Figure 6-19: Selected Features from NWI that meet Flooded Lands Criteria

MODIFIERS In order to more adequately describe the wetland and deepwater habitats, one each of the water regime, water chemistry, soil, or special modifiers may be applied at the class or lower level in the hierarchy.									
W	Vater Regime	Special Modifiers	Water Chemistr	ry	Soil				
Nontidal Saltwat A Temporarily Flooded B Seasonally Saturated C Seasonally Flooded D Continuously Saturated E Seasonally Flooded / Saturated F Semipermanently Flooded G Intermittently Exposed H Permanently Flooded K Artificially Flooded	y Flooded S Temporarily Flooded- Fresh	d Partly Drained/Ditched f Farmed m Managed h Diked/Impounded	Halinity/Salinity 1 Hyperhaline / Hypersaline 2 Euhaline / Eusaline 3 Mixohaline / M ixosaline (Brackish) 4 Polyhaline 5 Mesohaline 6 Oligohaline 0 Fresh	pH Modifiers for Fresh Water a Acid t Circumneutral i Alkaline	g Organic n Mineral				

Included in the flooded lands inventory if it meets water regime qualifier (gold box)

 $Source\ (modified): https://www.fws.gov/sites/default/files/documents/wetlands-and-deepwater-map-code-diagram.pdf$

IPCC (2019) allows for the exclusion of managed waterbodies from the inventory if the water surface area or residence time was not substantially changed by the construction of the dam. The guidance does not quantify what constitutes a "substantial" change, but here EPA excludes the U.S. Great Lakes from the inventory based on expert judgment that neither the surface area nor water residence time was substantially altered by their associated dams.

Reservoirs were disaggregated by state (using boundaries from the 2016 U.S. Census Bureau⁸⁹) and climate zone. Downstream and surface emissions for cross-state reservoirs were allocated to states based on the surface area that the reservoir occupied in each state. Only the U.S. portion of reservoirs that cross country borders were included in the inventory.

The surface area of reservoirs in Land Converted to Flooded Land decreased by approximately 70 percent from 1990 to 2021 (Table 6-100). This is due to reservoirs that were less than 20-years old at the beginning of time series entering the Flooded Land Remaining Flooded Land category when they exceeded 20 years of age. The rate at which flooded land has aged out of the Land Converted to Flooded Land category has outpaced the rate of new dam construction. New dam construction has slowed considerably during the time series with only four new dams constructed in 2021, 90 versus 538 in 1990 (Figure 6-20).

Table 6-100: National Totals of Reservoir Surface Area in Land Converted to Flooded Land (thousands of ha)

Surface Area (thousands of ha)	1990	2005	2017	2018	2019	2020	2021
Reservoir	234	63	85	84	84	64	64

⁸⁹ See https://www.census.gov/geographies/mapping-files/time-series/geo/carto-boundary-file.html.

⁹⁰ See https://nid.sec.usace.army.mil.

Figure 6-20: Number of Dams Built per Year from 1990 through 2021

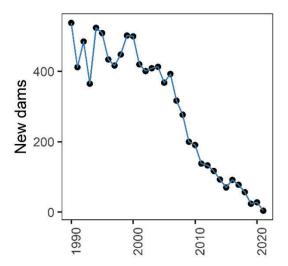


Table 6-101: State Breakdown of Reservoir Surface Area in Land Converted to Flooded Land (thousands of ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	5.4	0.0	0.0	0.0	0.0	0.0	0.0
Alaska	0.6	0.0	0.0	0.0	0.0	0.0	0.0
Arizona	0.0	0.1	0.0	0.0	0.0	0.0	0.0
Arkansas	9.6	0.9	1.2	1.2	1.2	1.2	1.2
California	16.2	1.0	0.1	0.1	0.1	0.1	0.1
Colorado	3.7	1.1	0.2	0.2	0.2	0.3	0.2
Connecticut	0.0	0.1	0.0	0.0	0.0	0.0	0.0
Delaware	0.0	0.0	0.0	0.0	0.0	0.0	0.0
District of Columbia	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Florida	14.1	2.1	1.1	0.8	0.8	0.8	0.5
Georgia	9.7	3.7	0.1	0.1	0.0	0.0	0.0
Hawaii	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Idaho	18.1	0.8	0.4	0.4	0.4	0.4	0.4
Illinois	8.8	10.5	9.5	9.5	9.5	0.1	0.1
Indiana	10.0	0.2	0.1	0.1	0.1	0.1	0.1
lowa	6.6	2.0	0.4	0.1	0.2	0.2	0.2
Kansas	18.9	0.3	0.2	0.2	0.1	0.1	0.1
Kentucky	4.7	0.0	0.0	0.0	0.0	0.0	0.0
Louisiana	5.8	3.2	0.2	0.0	0.0	0.0	0.0
Maine	12.5	4.2	0.0	0.0	0.0	0.0	0.0
Maryland	0.5	0.0	0.1	0.1	0.1	0.1	0.1
Massachusetts	1.1	0.2	0.9	0.9	0.9	0.8	0.8
Michigan	8.5	0.9	0.1	0.1	0.1	0.1	0.1
Minnesota	6.1	4.5	52.4	52.4	52.4	52.3	52.3
Mississippi	2.2	0.0	0.0	0.0	0.0	0.0	0.0
Missouri	0.2	9.7	9.7	9.7	9.7	0.0	0.0
Montana	13.4	1.2	0.1	0.1	0.1	0.1	0.1
Nebraska	5.3	1.3	0.1	0.1	0.1	0.0	0.0
Nevada	1.3	0.9	0.1	0.0	0.0	0.0	0.0
New Hampshire	0.3	0.0	0.0	0.0	0.0	0.0	0.0
New Jersey	0.0	0.0	0.0	0.0	0.0	0.0	0.0
New Mexico	0.1	0.0	0.0	0.0	0.0	0.0	0.0
New York	1.9	0.5	0.1	0.1	0.1	0.1	0.1

North Carolina	0.6	0.1	0.1	0.1	0.0	0.0	0.0
North Dakota	0.0	0.9	6.2	6.2	6.2	6.2	6.2
Ohio	6.4	0.4	0.2	0.2	0.2	0.2	0.1
Oklahoma	3.0	0.0	0.4	0.4	0.4	0.4	0.4
Oregon	1.5	0.0	0.0	0.0	0.0	0.0	0.0
Pennsylvania	1.2	0.0	0.0	0.0	0.0	0.0	0.0
Puerto Rico	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhode Island	0.1	0.0	0.0	0.0	0.0	0.0	0.0
South Carolina	14.0	6.2	0.0	0.0	0.0	0.0	0.0
South Dakota	0.4	3.3	0.8	0.8	0.8	0.0	0.0
Tennessee	3.0	0.0	0.1	0.1	0.1	0.1	0.1
Texas	10.1	0.0	0.0	0.0	0.0	0.0	0.0
Utah	1.6	0.0	0.2	0.2	0.2	0.2	0.2
Vermont	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Virginia	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Washington	2.7	0.2	0.0	0.0	0.0	0.0	0.0
West Virginia	1.9	1.6	0.0	0.0	0.0	0.0	0.0
Wisconsin	1.7	0.3	0.0	0.0	0.1	0.1	0.1
Wyoming	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Total	234.4	62.9	85.3	84.4	84.3	64.1	63.8

Uncertainty

Uncertainty in estimates of CH_4 and CO_2 emissions from reservoirs on Land Converted to Flooded Land were developed using IPCC Approach 2 and include uncertainty in the default emission factors and the flooded land area inventory (Table 6-102). Uncertainty in emission factors is provided in the 2019 Refinement to the 2006 IPCC Guidelines (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD, NWI, and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in these spatial datasets are unknown, but uncertainty for remote sensing products is assumed to be \pm 10 to 15 percent based on IPCC guidance (IPCC 2003). An uncertainty range of \pm 15 percent for the flooded land area estimates is assumed and is based on expert judgment.

Table 6-102: Approach 2 Quantitative Uncertainty Estimates for CH₄ and CO₂ Emissions from Reservoirs in Land Converted to Flooded Land

	:	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a							
Source	Gas	(MMT CO₂ Eq.)	(MMT CO ₂ Eq.)		(9	%)				
			Lower Bound	Upper Bound	Lower Bound	Upper Bound				
Reservoir										
Surface	CH ₄	0.16	0.14	0.18	-13.3%	13.4%				
Surface	CO_2	0.25	0.21	0.28	-13.9%	15.0%				
Downstream	CH_4	+	+	0.05	-62.8%	221.0%				
Total		0.42	0.36	0.49	-14.9%	16.8%				

⁺ Indicates values less than 0.05 MMT CO₂ Eq.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS in collaboration many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID. The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation

^a Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory (NWI). Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. Inventory QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the 2006 IPCC Guidelines (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

The 1990 through 2021 Inventory uses the National Wetland Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory report used the National Hydrography Data (NHD) as the primary geospatial data source. The NWI includes Alaska, Hawaii, and Puerto Rico, which were missing from 1990 through 2020 Inventory, but this had little effect on the emission estimates as Hawaii and Puerto Rico had no reservoirs in Land Converted to Flooded Land. In 1990, Alaska had 637 ha of reservoirs in Land Converted to Flooded Land, but all reservoirs in Alaska matriculated to Flooded Land Remaining Flooded Land by 2004.

The 1990 through 2020 Inventory distinguished between reservoirs and inundation areas. Inundation areas were defined as periodically flooded lands that bordered a permanently flooded reservoir. The NWI includes both permanently and periodically flooded lands, but does not consistently discriminate between them, therefore inundation areas and reservoirs are lumped into reservoirs for the 1990 through 2021 Inventory.

The 1990 though 2021 Inventory includes corrections to the age of several large reservoirs in South Dakota, North Dakota, Alabama, Arkansas, Georgia, and South Carolina. As result, these flooded lands are now included in Flooded Land Remaining Flooded Land throughout the time series, whereas they were misclassified as Land Converted to Flooded Land for a portion of the time series in the 1990 through 2020 Inventory. For the year 1990, these corrections reduced the surface area, methane emissions, and carbon dioxide emissions of reservoirs in Land Converted to Flooded Land by 138,375 ha, 18.8 kt CH₄, and 0.7 MMT CO₂, respectively.

Overall, the recalculations resulted in substantial reductions in methane and carbon dioxide emissions in the first few years of the time series (e.g., decrease of 4.1 MMT CO₂ Eq. in 1990), but the differences were minor by 2005 through 2020 (0.1 MMT CO₂ Eq.).

In addition, the EPA updated the global warming potential (GWP) for CH₄ (from 25 to 28) to reflect the 100-year GWP provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC Fourth Assessment Report (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations for CH₄ emissions from reservoirs was an average annual decrease of 0.3 MMT CO₂ Eq., or 49 percent, over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

The EPA is currently measuring greenhouse gas emissions from 108 reservoirs in the conterminous United States. The survey will be complete in September 2023 and the data will be used to develop country-specific emission factors for U.S. reservoirs. At the earliest, these emission factors will be used in the 2025 Inventory submission.

Emissions from Land Converted to Flooded Land-Other **Constructed Waterbodies**

Freshwater ponds are the only type of flooded lands within the "other constructed waterbodies" subcategory of Land Converted to Flooded Land that are included in this Inventory (see Methodology for details) because age data are not available for canals and ditches. All canals and ditches are assumed to be greater than 20-years old throughout the time series and are included in Flooded Land Remaining Flooded Land.

IPCC (2019) describes ponds as waterbodies that are "...constructed by excavation and/or construction of walls to hold water in the landscape for a range of uses, including agricultural water storage, access to water for livestock, recreation, and aquaculture." The IPCC "Decision tree for types of Flooded Land" (IPCC 2019, Fig. 7.2) elaborates on this description by defining waterbodies less than 8 ha as a subset of "other constructed waterbodies." For this Inventory, ponds are defined as managed flooded land not identified as "canal/ditch" (see Methods below) with surface area less than 8 ha. IPCC (2019) further distinguishes saline versus brackish ponds, with the former supporting lower CH₄ emission rates than the latter. Activity data on pond salinity is not uniformly available for the United States and all ponds in Land Converted to Flooded Land are assumed to be freshwater. Ponds often receive high organic matter and nutrient loadings, may have low oxygen levels, and are sites of substantial CH4 and CO2 emissions from anaerobic sediments.

Methane and CO₂ emissions from freshwater ponds decreased 95 percent from 1990 to 2021 due to flooded land matriculating from Land Converted to Flooded Land to Flooded Land Remaining Flooded Land. In 2021, Nebraska, Montana, and Iowa had the greatest CO₂ and CH₄ emissions for freshwater ponds in Land Converted to Flooded Land (Table 6-103 through Table 6-107, Figure 6-21).

Table 6-103: CH₄ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT CO₂ Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	0.1	+	+	+	+	+	+

⁺ Indicates values less than 0.05 MMT CO₂ Eq.

Table 6-104: CH₄ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (kt CH₄)

Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	3	1	+	+	+	+	+

⁺ Indicates values less than 0.5 kt

Table 6-105: CO₂ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT CO₂)

Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	0.1	+	+	+	+	+	+

⁺ Indicates values less than 0.05 MMT CO₂ Eq.

Table 6-106: CO₂ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT C)

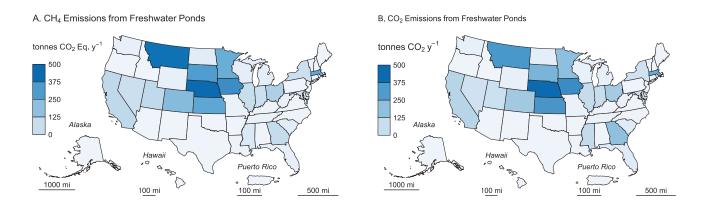
Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	0.02	0.01	+	+	+	+	+

⁺ Indicates values less than 0.005 MMT C

Table 6-107: CH₄ and CO₂ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land in 2021 (MT CO₂ Eq.)

to Flooded Land in	2021 (MT CO ₂		
_		Freshwater Ponds	
State	CH ₄	CO ₂	Total
Alabama	0	0	0
Alaska	0	0	0
Arizona	0	0	0
Arkansas	1	1	3
California	151	162	313
Colorado	278	202	480
Connecticut	0	0	0
Delaware	0	0	1
District of Columbia	0	0	0
Florida	25	50	76
Georgia	134	234	368
Hawaii	0	0	0
Idaho	1	0	1
Illinois	130	121	251
Indiana	111	116	227
lowa	425	393	818
Kansas	353	369	722
Kentucky	4	4	8
Louisiana	3	6	10
Maine	1	1	2
Maryland	100	104	204
Massachusetts	342	311	654
Michigan	37	27	64
Minnesota	330	241	570
Mississippi	65	127	191
Missouri	13	14	27
Montana	491	359	850
Nebraska	514	471	985
Nevada	113	93	206
New Hampshire	1	0	1
New Jersey	0	0	0
New Mexico	0	0	0
New York	121	96	217
North Carolina	6	6	11
North Dakota	47	34	82
Ohio	195	200	396
Oklahoma	0	0	0
Oregon	0	0	0
Pennsylvania	0	0	0
Puerto Rico	0	0	0
Rhode Island	0	0	0
South Carolina	46	48	94
South Dakota	378	276	655
Tennessee	13	13	26
Texas	0	0	0
Utah	146	107	253
Vermont	0	0	0
Virginia	0	0	0
Washington	23	28	50
West Virginia	15	16	31
Wisconsin	34	25	59
Wyoming	29	21	51
TOTAL	4,677	4,277	8,954

Figure 6-21: 2021 A) CH₄ and B) CO₂ Emissions from Other Constructed Waterbodies (Freshwater Ponds) in Land Converted to Flooded Land (MT CO₂ Eq.)



Methodology and Time-Series Consistency

Estimates of CH₄ and CO₂ emissions for other constructed waterbodies in Land Converted to Flooded Land follow the Tier 1 methodology in IPCC (2019). All calculations are performed at the state level and summed to obtain national estimates. Greenhouse gas emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and an emission factor (Table 6-108). Due to a lack of empirical data on CO₂ emissions from recently created ponds, IPCC (2019) states "For all types of ponds created by damming, the methodology described above to estimate CO₂ emissions from land converted to reservoirs may be used." This Inventory uses IPCC default CO₂ emission factors for land converted to reservoirs when estimating CO₂ emissions from land converted to freshwater ponds. IPCC guidance also states that "there is insufficient information available to derive separate CH₄ emission factors for recently constructed ponds..." and allows for the use of IPCC default CH₄ emission factors for land remaining flooded land. Downstream emissions are not inventoried for other constructed waterbodies because 1) many of these systems are not associated with dams (e.g., excavated ponds and ditches), and 2) there are insufficient data to derive downstream emission factors for other constructed waterbodies that are associated with dams (IPCC 2019).

Table 6-108: IPCC Default Methane and CO₂ Emission Factors for Other Constructed Waterbodies in Land Converted to Flooded Land

		Emission Factor			
Other Constructed Waterbody	Climate Zone	MT CH ₄ ha ⁻¹ y ⁻¹	MT CO ₂ ha ⁻¹ y ⁻¹		
Freshwater ponds	Boreal	0.183	3.45		
Freshwater ponds	Cool Temperate	0.183	3.74		
Freshwater ponds	Warm Temperate Dry	0.183	6.23		
Freshwater ponds	Warm Temperate Moist	0.183	5.35		
Freshwater ponds	Tropical Dry/Montane	0.183	10.82		
Freshwater ponds	Tropical Moist/Wet	0.183	10.16		

Area Estimates

Other constructed waterbodies were identified from the NHDWaterbody layer in the National Hydrography

Dataset Plus V2 (NHD), 91 the National Inventory of Dams (NID), 92 the National Wetlands Inventory (NWI), 93 and the Navigable Waterways (NW) network.⁹⁴ The NHD only covers the conterminous United States, whereas the NID, NW and NWI also include Alaska, Hawaii, and Puerto Rico.

Waterbodies in the NHDWaterbody layer that were less than or equal to 20-years old, less than 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered freshwater ponds in Land Converted to Flooded Land: 1) the waterbody was classified "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to nearby NID feature (between 100 m to 1000 m).

EPA assumes that all features included in the NW are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. NW features that were less than 8 ha in surface area and not identified as canals/ditch (see below) were considered freshwater ponds. Only 2.1 percent of NW features met these criteria, and they were primarily associated with larger navigable waterways, such as lock chambers on impounded rivers.

NWI features were considered "managed" if they had a special modifier value indicating the presence of management activities (Figure 6-19). To be included in the flooded lands inventory, the managed flooded land had to be wet or saturated for at least one season per year (see 'Water Regime' in Figure 6-19). NWI features that met these criteria, were less than 8 Ha in surface area, and were not a canal/ditch were defined as freshwater ponds.

Surface areas for other constructed waterbodies were taken from NHD, NWI or the NW. If features from the NHD, NWI, or the NW datasets overlapped, duplicate areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

The age of other constructed waterbody features was determined by assuming the waterbody was created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the waterbody was greater than 20-years old throughout the time series. No canal/ditch features were associated with a nearby dam, therefore all canal/ditch features were assumed to be greater than 20-years old through the time series.

For the year 2021, this Inventory contains 913 ha of freshwater ponds in Land Converted to Flooded Land. The surface area of freshwater ponds decreased by 94 percent from 1990 to 2021 due to flooded lands aging out of Land Converted to Flooded Land more quickly than new flooded lands entered the category. The greatest reduction in freshwater pond surface area occurred in Iowa, Kansas, and Georgia (Table 6-110). Freshwater ponds in the 2021 inventory are most abundant in Nebraska, Montana, and Kansas (Figure 6-22).

Table 6-109: National Surface Area Totals of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)

Other Constructed Waterbodies	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	15,572	3800	1805	1574	1299	1041	913

⁹¹ See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

⁹² See https://nid.sec.usace.army.mil.

⁹³ See https://www.fws.gov/program/national-wetlands-inventory/data-download.

⁹⁴ See https://hifld-geoplatform.opendata.arcgis.com/datasets/geoplatform::navigable-waterway-network-lines-1/about.

Figure 6-22: Surface Area of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)

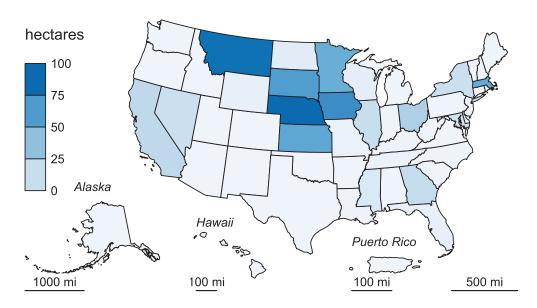


Table 6-110: State Surface Area Totals of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	344	19	3	0	0	0	0
Alaska	6	0	0	0	0	0	0
Arizona	46	16	7	4	4	0	0
Arkansas	316	0	0	0	0	0	0
California	241	86	43	42	37	30	29
Colorado	276	45	60	50	52	51	54
Connecticut	54	3	0	0	0	0	0
Delaware	4	0	0	0	0	0	0
District of Columbia	0	0	0	0	0	0	0
Florida	128	50	10	9	5	5	5
Georgia	1,804	87	35	35	32	26	26
Hawaii	7	2	0	0	0	0	0
Idaho	102	1	0	0	0	0	0
Illinois	556	115	56	41	36	26	25
Indiana	510	115	30	27	22	22	22
lowa	2,227	1,403	511	430	268	156	83
Kansas	2,017	127	111	98	91	85	69
Kentucky	390	25	2	1	1	1	1
Louisiana	133	10	5	5	5	1	1
Maine	54	8	0	0	0	0	0
Maryland	177	57	17	22	22	21	19
Massachusetts	66	70	88	80	74	68	67
Michigan	158	45	19	15	15	7	7
Minnesota	263	133	110	103	96	73	64
Mississippi	160	34	23	23	18	13	13
Missouri	285	17	4	4	3	3	3
Montana	368	108	100	100	96	96	96

Nebraska	1,271	274	191	142	130	108	100
Nevada	13	57	36	26	25	22	22
New Hampshire	35	12	1	1	1	1	0
New Jersey	1	0	0	0	0	0	0
New Mexico	6	0	0	0	0	0	0
New York	287	120	29	29	27	27	24
North Carolina	53	7	1	1	1	1	1
North Dakota	11	21	9	9	9	9	9
Ohio	389	250	104	93	79	53	38
Oklahoma	111	3	3	3	0	0	0
Oregon	8	9	7	0	0	0	0
Pennsylvania	19	9	0	0	0	0	0
Puerto Rico	0	0	0	0	0	0	0
Rhode Island	9	7	0	0	0	0	0
South Carolina	819	228	25	24	13	9	9
South Dakota	232	94	97	95	78	77	74
Tennessee	712	42	23	14	9	3	2
Texas	565	9	0	0	0	0	0
Utah	55	20	30	30	30	29	29
Vermont	17	4	0	0	0	0	0
Virginia	0	0	0	0	0	0	0
Washington	54	23	0	0	4	4	4
West Virginia	31	6	3	3	3	3	3
Wisconsin	146	9	7	7	7	7	7
Wyoming	39	16	5	6	6	6	6
TOTAL	15,572	3,800	1,805	1,574	1,299	1,041	913

Uncertainty

Uncertainty in estimates of CO_2 and CH_4 emissions from Land Converted to Flooded Land—Other Constructed Water Bodies include uncertainty in the default emission factors and the flooded land area inventory. Uncertainty in emission factors is provided in the 2019 Refinement to the 2006 IPCC Guidelines (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in the NHD, NWI, NID, and NW are unknown, but uncertainty for remote sensing products is \pm 10 - 15 percent (IPCC 2003). EPA assumes an uncertainty of \pm 15 percent for the flooded land area inventory based on expert judgment. These uncertainties do not include the underestimate of pond surface area discussed above.

Table 6-111: Approach 2 Quantitative Uncertainty Estimates for CH₄ and CO₂ Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate ^a						
		(kt CO ₂ Eq.)	(kt CC	O ₂ Eq.)	(%)				
			Lower Bound	Upper Bound	Lower Bound	Upper Bound			
Freshwater ponds	CH ₄	4.70	4.60	4.80	-2.7%	3.2%			
Freshwater ponds	CO_2	4.28	4.18	4.37	-2.2%	2.2%			
Total		8.95	8.77	9.19	-2.1%	2.6%			

^a Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval. Note: Totals may not sum due to independent rounding.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS with collaboration from many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National

Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID. The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory. Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. Inventory QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the 2006 IPCC Guidelines (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

Methane and carbon dioxide emissions from other constructed waterbodies in Land Converted to Flooded Land were recalculated using updated geospatial data in the 1990 through 2021 Inventory. The updated geospatial data is more detailed than what was used for the 1990 through 2020 Inventory, and includes Alaska, Hawaii, and Puerto Rico, which were not included in the 1990 through 2020 Inventory. Despite these recalculations, CO_2 emission estimates agreed to within 0.005 MMT CO_2 between the previous (i.e., 1990 through 2020) and current (i.e., 1990 through 2021) Inventories.

In addition, the EPA updated the global warming potential (GWP) for calculating CO₂-equivalent emissions of CH₄ (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations for CH₄ emissions from constructed waterbodies was an increase in emissions amounting to an average annual 11 percent increase over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

Features < 8 ha in the NW that were not identified as Canal/Ditch were defined as freshwater ponds. Many of these features are lock chambers connected to an upstream reservoir. These systems likely have emission rates more similar to a reservoir than freshwater pond. In the next Inventory (i.e., 1990 through 2022) these systems will be classified as reservoirs.

6.10 Settlements Remaining Settlements (CRF Category 4E1)

Soil Carbon Stock Changes (CRF Category 4E1)

Soil organic C stock changes for Settlements Remaining Settlements occur in both mineral and organic soils. However, the United States does not estimate changes in soil organic C stocks for mineral soils in Settlements Remaining Settlements. This approach is consistent with the assumption of the Tier 1 method in the 2006 IPCC Guidelines (IPCC 2006) that inputs equal outputs, and therefore the soil organic C stocks do not change. This assumption may be re-evaluated in the future if funding and resources are available to conduct an analysis of soil organic C stock changes for mineral soils in Settlements Remaining Settlements.

Drainage of organic soils is common when wetland areas have been developed for settlements. Organic soils, also referred to as Histosols, include all soils with more than 12 to 20 percent organic C by weight, depending on clay content (NRCS 1999; Brady and Weil 1999). The organic layer of these soils can be very deep (i.e., several meters), and form under inundated conditions that results in minimal decomposition of plant residues. Drainage of organic soils leads to aeration of the soil that accelerates decomposition rate and CO₂ emissions. ⁹⁵ Due to the depth and richness of the organic layers, C loss from drained organic soils can continue over long periods of time, which varies depending on climate and composition (i.e., decomposability) of the organic matter (Armentano and Menges 1986).

Settlements Remaining Settlements includes all areas that have been settlements for a continuous time period of at least 20 years according to the 2015 United States Department of Agriculture (USDA) National Resources Inventory (NRI) (USDA-NRCS 2018)⁹⁶ or according to the National Land Cover Dataset (NLCD) for federal lands (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015). There are discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the Inventory for Settlements Remaining Settlements. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Settlements Remaining Settlements Inventory. Second, Alaska and the small amount of settlements on federal lands are not included in this Inventory even though these areas are part of the U.S. managed land base. These differences lead to discrepancies between the managed area in Settlements Remaining Settlements and the settlement area included in the Inventory analysis (Table 6-113). There is a planned improvement to include CO₂ emissions from drainage of organic soils in settlements of Alaska and federal lands as part of a future Inventory (See Planned Improvements Section).

CO₂ emissions from drained organic soils in settlements are 15.9 MMT CO₂ Eq. (4.3 MMT C) in 2021 (See Table 6-112 and Table 6-113). Although the flux is relatively small, the amount has increased by over 40 percent since 1990 due to an increase in area of drained organic soils in settlements.

Table 6-112: Net CO₂ Flux from Soil C Stock Changes in Settlements Remaining Settlements (MMT CO₂ Eq.)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Organic Soils	11.3	12.2	16.0	15.9	15.9	15.9	15.9

⁹⁵ N₂O emissions from soils are included in the N₂O Emissions from Settlement Soils section.

⁹⁶ NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an overestimation of Settlements Remaining Settlements in the early part of the time series to the extent that some areas are converted to settlements between 1971 and 1978.

Table 6-113: Net CO₂ Flux from Soil C Stock Changes in Settlements Remaining Settlements (MMT C)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Organic Soils	3.1	3.3	4.4	4.3	4.3	4.3	4.3

Methodology and Time-Series Consistency

An IPCC Tier 2 method is used to estimate soil organic C stock changes for organic soils in Settlements Remaining Settlements (IPCC 2006). Organic soils in Settlements Remaining Settlements are assumed to be losing C at a rate similar to croplands due to deep drainage, and therefore emission rates are based on country-specific values for cropland (Ogle et al. 2003).

The land area designated as settlements is based primarily on the 2018 NRI (USDA-NRCS 2018) with additional information from the NLCD (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015). It is assumed that all settlement area on organic soils is drained, and those areas are provided in Table 6-114 (See Section 6.1, Representation of the U.S. Land Base for more information). The area of drained organic soils is estimated from the NRI spatial weights and aggregated to the country (Table 6-114). The area of land on organic soils in Settlements Remaining Settlements has increased from 220 thousand hectares in 1990 to over 303 thousand hectares in 2015. The area of land on organic soils have been incorporated into the inventory analysis for Settlements Remaining Settlements through 2015.

Table 6-114: Thousands of Hectares of Drained Organic Soils in Settlements Remaining Settlements

	Area
Year	(Thousand Hectares)
1990	220
2005	235
2014	291
2015	303
2016	*
2017	*
2018	*
2019	*
2020	*
2021	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

To estimate CO₂ emissions from drained organic soils across the time series from 1990 to 2015, the area of organic soils by climate (i.e., cool temperate, warm temperate, subtropical) in Settlements Remaining Settlements is multiplied by the appropriate country-specific emission factors for Cropland Remaining Cropland under the assumption that there is deep drainage of the soils. The emission factors are 11.2 MT C per ha in cool temperate regions, 14.0 MT C per ha in warm temperate regions, and 14.3 MT C per ha in subtropical regions (see Annex 3.12 for more information).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015, and a linear extrapolation method is used to approximate emissions for the remainder of the 2016 to 2021 time series (See Box 6-4 in Cropland Remaining Cropland). The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and is a standard data splicing method for imputing missing

emissions data in a time series (IPCC 2006). The Tier 2 method described previously will be applied in future Inventories to recalculate the estimates beyond 2015 as new activity data are integrated into the analysis.

Uncertainty

Uncertainty for the Tier 2 approach is derived using a Monte Carlo approach, along with additional uncertainty propagated through the Monte Carlo Analysis for 2016 to 2021 based on the linear time series model. The results of the Approach 2 Monte Carlo uncertainty analysis are summarized in Table 6-115. Soil C losses from drained organic soils in Settlements Remaining Settlements for 2021 are estimated to be between 7.3 and 24.4 MMT CO₂ Eq. at a 95 percent confidence level. This indicates a range of 54 percent below and 54 percent above the 2021 emission estimate of 15.9 MMT CO₂ Eq.

Table 6-115: Uncertainty Estimates for CO₂ Emissions from Drained Organic Soils in Settlements Remaining Settlements (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty	Range Relativ	e to Emission	Estimate ^a
		(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		(%)	
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Organic Soils	CO ₂	15.9	7.3	24.4	-54%	54%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. No errors were found in this Inventory.

Recalculations Discussion

There were no recalculations to the 1990 through 2020 time series in this Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) estimating CO_2 emissions from drainage of organic soils in settlements of Alaska and federal lands in order to provide a complete inventory of emissions for this category. These improvements will resolve most of the differences between the managed land base for Settlements Remaining Settlements and amount of area currently included in Settlements Remaining Settlements Inventory (See Table 6-116). These improvements will be made as funding and resources are available to expand the inventory for this source category.

Table 6-116: Area of Managed Land in Settlements Remaining Settlements that is not included in the current Inventory (Thousand Hectares)

		Area (Thousand Hectard	es)
	SRS Managed Land	SRS Area Included	
Year	Area (Section 6.1)	in Inventory	Difference
1990	30,561	30,425	136
1991	30,559	30,430	129
1992	30,556	30,434	123
1993	30,483	30,346	138
1994	30,398	30,264	135
1995	30,336	30,206	130
1996	30,276	30,157	119
1997	30,207	30,105	101
1998	30,141	30,041	99
1999	30,087	29,992	95
2000	30,029	29,949	80
2001	29,976	29,889	87
2002	29,969	29,882	87
2003	30,493	30,378	115
2004	30,986	30,859	127
2005	31,445	31,370	75
2006	31,953	31,812	140
2007	32,410	32,317	93
2008	33,028	32,922	106
2009	33,604	33,494	111
2010	34,179	34,069	111
2011	34,744	34,662	82
2012	35,315	35,215	100
2013	36,238	36,156	81
2014	37,172	37,129	43
2015	38,040	38,058	-18
2016	38,952	*	*
2017	39,875	*	*
2018	40,771	*	*
2019	41,617	*	*
2020	42,467	*	*
2021	43,189	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

Changes in Carbon Stocks in Settlement Trees (CRF Source Category 4E1)

Settlements are land uses where human populations and activities are concentrated. In these areas, the anthropogenic impacts on tree growth, stocking and mortality are particularly pronounced (Nowak 2012) in comparison to forest lands where non-anthropogenic forces can have more significant impacts. Estimates included in this section include net CO₂ and C flux from trees on Settlements Remaining Settlements and Land Converted to Settlements as it is not possible to report on these separately at this time.

Trees in settlement areas of the United States are estimated to account for an average annual net sequestration of $117.2 \text{ MMT CO}_2 \text{ Eq.}$ (32.0 MMT C) over the period from 1990 through 2021. Net C sequestration from settlement trees in 2021 is estimated to be $137.8 \text{ MMT CO}_2 \text{ Eq.}$ (37.6 MMT C) (Table 6-117). Dominant factors affecting C flux trends for settlement trees are changes in the amount of settlement area (increasing sequestration due to more

land and trees) and net changes in tree cover (e.g., tree losses vs tree gains through planting and natural regeneration), with percent tree cover trending downward recently. In addition, changes in species composition, tree sizes and tree densities affect base C flux estimates. Annual sequestration increased by 43 percent between 1990 and 2021 due to increases in settlement area and changes in total tree cover.

Trees in settlements often grow faster than forest trees because of their relatively open structure (Nowak and Crane 2002). Because tree density in settlements is typically much lower than in forested areas, the C storage per hectare of land is in fact smaller for settlement areas than for forest areas. Also, percent tree cover in settlement areas are less than in forests and this tree cover varies significantly across the United States (e.g., Nowak and Greenfield 2018a). To quantify the C stored in settlement trees, the methodology used here requires analysis per unit area of tree cover, rather than per unit of total land area (as is done for Forest Lands).

Table 6-117: Net Flux from Trees in Settlements Remaining Settlements (MMT CO₂ Eq. and MMT C)^a

Year	1990	2005	2017	2018	2019	2020	2021
MMT CO ₂ Eq.	(96.4)	(117.4)	(129.6)	(129.5)	(129.3)	(136.7)	(137.8)
MMT C	(26.3)	(32.0)	(35.4)	(35.3)	(35.3)	(37.3)	(37.6)

^a These estimates include net CO₂ and C flux from trees on Settlements Remaining Settlements and Land Converted to Settlements as it is not possible to report on these separately at this time.

Note: Parentheses indicate net sequestration.

Methodology and Time-Series Consistency

To estimate net carbon sequestration in settlement areas, three types of data are required for each state:

- 1. Settlement area
- 2. Percent tree cover in settlement areas
- 3. Carbon sequestration density per unit of tree cover

Settlement Area

Settlement area is defined in Section 6.1 Representation of the U.S. Land Base as a land-use category representing developed areas. The data used to estimate settlement area within Section 6.1 comes from the latest NRI as updated through 2017, with the extension of the time series through 2021 based on assuming the settlement area is the same as 2017. NRI data is also harmonized with the FIA dataset, which are available through 2021, and the NLCD dataset, which is available through 2019. This process of combining the datasets extends the time series to ensure that there is a complete and consistent representation of land use data for all source categories in the LULUCF sector. Annual estimates of CO2 flux (Table 6-117) were developed based on estimates of annual settlement area and tree cover derived from NLCD developed lands. Developed land, which was used to estimate tree cover in settlement areas, is about six percent higher than the area categorized as Settlements in the Representation of the U.S. Land Base developed for this report.

Percent Tree Cover in Settlement Areas

Percent tree cover in settlement area by state is needed to convert settlement land area to settlement tree cover area. Converting to tree cover area is essential as tree cover, and thus C estimates, can vary widely among states in settlement areas due to variations in the amount of tree cover (e.g., Nowak and Greenfield 2018a). However, since the specific geography of settlement area is unknown because they are based on NRI sampling methods, NLCD developed land was used to estimate the percent tree cover to be used in settlement areas. NLCD developed land cover classes 21-24 (developed, open space (21), low intensity (22), medium intensity (23), and high intensity (24)) were used to estimate percent tree cover in settlement area by state (U.S. Department of Interior 2018; MRLC 2013).

- a) "Developed, Open Space areas with a mixture of some constructed materials, but mostly vegetation in the form of lawn grasses. Impervious surfaces account for less than 20 percent of total cover. These areas most commonly include large-lot single-family housing units, parks, golf courses, and vegetation planted in developed settings for recreation, erosion control, or aesthetic purposes." Plots designated as either park, recreation, cemetery, open space, institutional or vacant land were classified as Developed Open Space.
- b) "Developed, Low Intensity areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 20 to 49 percent of total cover. These areas most commonly include single-family housing units." Plots designated as single family or low-density residential land were classified as Developed, Low Intensity.
- "Developed, Medium Intensity areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 50 to 79 percent of the total cover. These areas most commonly include single-family housing units." Plots designated as medium density residential, other urban or mixed urban were classified as Developed, Medium Intensity.
- d) "Developed High Intensity highly developed areas where people reside or work in high numbers. Examples include apartment complexes, row houses and commercial/industrial. Impervious surfaces account for 80 to 100 percent of the total cover." Plots designated as either commercial, industrial, high density residential, downtown, multi-family residential, shopping, transportation or utility were classified as Developed, High Intensity.

As NLCD is known to underestimate tree cover (Nowak and Greenfield 2010), photo-interpretation of tree cover within NLCD developed lands was conducted for the years of c. 2011 and 2016 using 1,000 random points to determine an average adjustment factor for NLCD tree cover estimates in developed land and determine recent tree cover changes. This photo-interpretation of change followed methods detailed in Nowak and Greenfield (2018b). Percent tree cover (%TC) in settlement areas by state was estimated as:

%TC in state = state NLCD %TC x national photo-interpreted %TC / national NLCD %TC

Percent tree cover in settlement areas by year was set as follows:

- 1990 to 2011: used 2011 NLCD tree cover adjusted with 2011 photo-interpreted values
- 2012 to 2015: used 2011 NLCD tree cover adjusted with photo-interpreted values, which were interpolated from values between 2011 and 2016
- 2016 to 2020: used 2011 NLCD tree cover adjusted with 2016 photo-interpreted values

Carbon Sequestration Density per Unit of Tree Cover

Methods for quantifying settlement tree biomass, C sequestration, and C emissions from tree mortality and decomposition were taken directly from Nowak et al. (2013), Nowak and Crane (2002), and Nowak (1994). In general, net C sequestration estimates followed three steps, each of which is explained further in the paragraphs below. First, field data from cities and urban areas within entire states were used to estimate C in tree biomass from field data on measured tree dimensions. Second, estimates of annual tree growth and biomass increment were generated from published literature and adjusted for tree condition, crown competition, and growing season to generate estimates of gross C sequestration in settlement trees for all 50 states and the District of Columbia. Third, estimates of C emissions due to mortality and decomposition were subtracted from gross C sequestration estimates to obtain estimates of net C sequestration. Carbon storage, gross and net sequestration estimates were standardized per unit tree cover based on tree cover in the study area.

Settlement tree carbon estimates are based on published literature (Nowak et al. 2013; Nowak and Crane 2002; Nowak 1994) as well as newer data from the i-Tree database⁹⁷ and U.S. Forest Service urban forest inventory data (e.g., Nowak et al. 2016, 2017) (Table 6-118). These data are based on collected field measurements in several U.S. cities between 1989 and 2017. Carbon storage and sequestration in these cities were estimated using the U.S. Forest Service's i-Tree Eco model (Nowak et al. 2008). This computer model uses standardized field data from randomly located plots, along with local hourly air pollution and meteorological data, to quantify urban forest structure, monetary values of the urban forest, and environmental effects, including total C stored and annual C sequestration (Nowak et al. 2013).

In each city, a random sample of plots were measured to assess tree stem diameter, tree height, crown height and crown width, tree location, species, and canopy condition. The data for each tree were used to estimate total dryweight biomass using allometric models, a root-to-shoot ratio to convert aboveground biomass estimates to whole tree biomass, and wood moisture content. Total dry weight biomass was converted to C by dividing by two (50 percent carbon content). An adjustment factor of 0.8 was used for open grown trees to account for settlement trees having less aboveground biomass for a given stem diameter than predicted by allometric models based on forest trees (Nowak 1994). Carbon storage estimates for deciduous trees include only C stored in wood. Estimated C storage was divided by tree cover in the area to estimate carbon storage per square meter of tree cover.

Table 6-118: Carbon Storage (kg C/m² tree cover), Gross and Net Sequestration (kg C/m² tree cover/year) and Tree Cover (percent) among Sampled U.S. Cities (see Nowak et al. 2013)

				Sequestr	ration_				
								Tree	
City	Storage	SE	Gross	SE	Net	SE	Ratioa	Cover	SE
Adrian, MI	12.17	1.88	0.34	0.04	0.13	0.07	0.36	22.1	2.3
Albuquerque, NM	5.61	0.97	0.24	0.03	0.20	0.03	0.82	13.3	1.5
Arlington, TX	6.37	0.73	0.29	0.03	0.26	0.03	0.91	22.5	0.3
Atlanta, GA	6.63	0.54	0.23	0.02	0.18	0.03	0.76	53.9	1.6
Austin, TX	3.57	0.25	0.17	0.01	0.13	0.01	0.73	30.8	1.1
Baltimore, MD	10.30	1.24	0.33	0.04	0.20	0.04	0.59	28.5	1.0
Boise, ID	7.33	2.16	0.26	0.04	0.16	0.06	0.64	7.8	0.2
Boston, MA	7.02	0.96	0.23	0.03	0.17	0.02	0.73	28.9	1.5
Camden, NJ	11.04	6.78	0.32	0.20	0.03	0.10	0.11	16.3	9.9
Casper, WY	6.97	1.50	0.22	0.04	0.12	0.04	0.54	8.9	1.0
Chester, PA	8.83	1.20	0.39	0.04	0.25	0.05	0.64	20.5	1.7
Chicago (region), IL	9.38	0.59	0.38	0.02	0.26	0.02	0.70	15.5	0.3
Chicago, IL	6.03	0.64	0.21	0.02	0.15	0.02	0.70	18.0	1.2
Corvallis, OR	10.68	1.80	0.22	0.03	0.20	0.03	0.91	32.6	4.1
El Paso, TX	3.93	0.86	0.32	0.05	0.23	0.05	0.72	5.9	1.0
Freehold, NJ	11.50	1.78	0.31	0.05	0.20	0.05	0.64	31.2	3.3
Gainesville, FL	6.33	0.99	0.22	0.03	0.16	0.03	0.73	50.6	3.1
Golden, CO	5.88	1.33	0.23	0.05	0.18	0.04	0.79	11.4	1.5
Grand Rapids, MI	9.36	1.36	0.30	0.04	0.20	0.05	0.65	23.8	2.0
Hartford, CT	10.89	1.62	0.33	0.05	0.19	0.05	0.57	26.2	2.0
Houston, TX	4.55	0.48	0.31	0.03	0.25	0.03	0.83	18.4	1.0
Indiana ^b	8.80	2.68	0.29	0.08	0.27	0.07	0.92	20.1	3.2
Jersey City, NJ	4.37	0.88	0.18	0.03	0.13	0.04	0.72	11.5	1.7
Kansas ^b	7.42	1.30	0.28	0.05	0.22	0.04	0.78	14.0	1.6
Kansas City (region),									
MO/KS	7.79	0.85	0.39	0.04	0.26	0.04	0.67	20.2	1.7
Lake Forest Park, WA	12.76	2.63	0.49	0.07	0.42	0.07	0.87	42.4	0.8

⁹⁷ See http://www.itreetools.org.

Las Cruces, NM	3.01	0.95	0.31	0.14	0.26	0.14	0.86	2.9	1.0
Lincoln, NE	10.64	1.74	0.41	0.06	0.35	0.06	0.86	14.4	1.6
Los Angeles, CA	4.59	0.51	0.18	0.02	0.11	0.02	0.61	20.6	1.3
Milwaukee, WI	7.26	1.18	0.26	0.03	0.18	0.03	0.68	21.6	1.6
Minneapolis, MN	4.41	0.74	0.16	0.02	0.08	0.05	0.52	34.1	1.6
Moorestown, NJ	9.95	0.93	0.32	0.03	0.24	0.03	0.75	28.0	1.6
Morgantown, WV	9.52	1.16	0.30	0.04	0.23	0.03	0.78	39.6	2.2
Nebraska ^b	6.67	1.86	0.27	0.07	0.23	0.06	0.84	15.0	3.6
New York, NY	6.32	0.75	0.33	0.03	0.25	0.03	0.76	20.9	1.3
North Dakota ^b	7.78	2.47	0.28	0.08	0.13	0.08	0.48	2.7	0.6
Oakland, CA	5.24	0.19	NA	NA	NA	NA	NA	21.0	0.2
Oconomowoc, WI	10.34	4.53	0.25	0.10	0.16	0.06	0.65	25.0	7.9
Omaha, NE	14.14	2.29	0.51	0.08	0.40	0.07	0.78	14.8	1.6
Philadelphia, PA	8.65	1.46	0.33	0.05	0.29	0.05	0.86	20.8	1.8
Phoenix, AZ	3.42	0.50	0.38	0.04	0.35	0.04	0.94	9.9	1.2
Roanoke, VA	9.20	1.33	0.40	0.06	0.27	0.05	0.67	31.7	3.3
Sacramento, CA	7.82	1.57	0.38	0.06	0.33	0.06	0.87	13.2	1.7
San Francisco, CA	9.18	2.25	0.24	0.05	0.22	0.05	0.92	16.0	2.6
Scranton, PA	9.24	1.28	0.40	0.05	0.30	0.04	0.74	22.0	1.9
Seattle, WA	9.59	0.98	0.67	0.06	0.55	0.05	0.82	27.1	0.4
South Dakotab	3.14	0.66	0.13	0.03	0.11	0.02	0.87	16.5	2.2
Syracuse, NY	9.48	1.08	0.30	0.03	0.22	0.04	0.72	26.9	1.3
Tennessee ^b	6.47	0.50	0.34	0.02	0.30	0.02	0.89	37.7	0.8
Washington, DC	8.52	1.04	0.26	0.03	0.21	0.03	0.79	35.0	2.0
Woodbridge, NJ	8.19	0.82	0.29	0.03	0.21	0.03	0.73	29.5	1.7

SE (Standard Error)

To determine gross sequestration rates, tree growth rates need to be estimated. Base growth rates were standardized for open-grown trees in areas with 153 days of frost-free length based on measured data on tree growth (Nowak et al. 2013). These growth rates were adjusted to local tree conditions based on length of frost-free season, crown competition (as crown competition increased, growth rates decreased), and tree condition (as tree condition decreased, growth rates decreased). Annual growth rates were applied to each sampled tree to estimate gross annual sequestration—that is, the difference in C storage estimates between year 1 and year (x + 1) represents the gross amount of C sequestered. These annual gross C sequestration rates for each tree were then scaled up to city estimates using tree population information. Total C sequestration was divided by total tree cover to estimate a gross carbon sequestration density (kg C/m² of tree cover/year). The area of assessment for each city or state was defined by its political boundaries; parks and other forested urban areas were thus included in sequestration estimates.

Where gross C sequestration accounts for all C sequestered, net C sequestration for settlement trees considers C emissions associated with tree death and removals. The third step in the methodology estimates net C emissions from settlement trees based on estimates of annual mortality, tree condition, and assumptions about whether dead trees were removed from the site. Estimates of annual mortality rates by diameter class and condition class were obtained from a study of street-tree mortality (Nowak 1986). Different decomposition rates were applied to dead trees left standing compared with those removed from the site. For removed trees, different rates were applied to the removed/aboveground biomass in contrast to the belowground biomass (Nowak et al. 2002). The estimated annual gross C emission rates for each plot were then scaled up to city estimates using tree population information.

The full methodology development is described in the underlying literature, and key details and assumptions were made as follows. The allometric models applied to the field data for the Nowak methodology for each tree were taken from the scientific literature (see Nowak 1994, Nowak et al. 2002), but if no allometric model could be found

NA (Not Available)

^a Ratio of net to gross sequestration

^b Statewide assessment of urban areas

for the particular species, the average result for the genus or botanical relative was used. The adjustment (0.8) to account for less live tree biomass in open-grown urban trees was based on information in Nowak (1994). Measured tree growth rates for street (Frelich 1992; Fleming 1988; Nowak 1994), park (deVries 1987), and forest (Smith and Shifley 1984) trees were standardized to an average length of growing season (153 frost free days) and adjusted for site competition and tree condition. Standardized growth rates of trees of the same species or genus were then compared to determine the average difference between standardized street tree growth and standardized park and forest growth rates. Crown light exposure (CLE) measurements (number of sides and/or top of tree exposed to sunlight) were used to represent forest, park, and open (street) tree growth conditions. Local tree base growth rates were then calculated as the average standardized growth rate for open-grown trees multiplied by the number of frost-free days divided by 153. Growth rates were then adjusted for CLE. The CLEadjusted growth rate was then adjusted based on tree condition to determine the final growth rate. Assumptions for which dead trees would be removed versus left standing were developed specific to each land use and were based on expert judgment of the authors. Decomposition rates were based on literature estimates (Nowak et al. 2013).

Estimates of gross and net sequestration rates for each of the 50 states and the District of Columbia (Table 6-119) were compiled in units of C sequestration per unit area of tree canopy cover. These rates were used in conjunction with estimates of state settlement area and developed land percent tree cover data to calculate each state's annual net C sequestration by urban trees. This method was described in Nowak et al. (2013) and has been modified here to incorporate developed land percent tree cover data.

Net annual C sequestration estimates were obtained for all 50 states and the District of Columbia by multiplying the gross annual emission estimates by 0.73, the average ratio for net/gross sequestration (Table 6-119). However, state specific ratios were used where available.

State Carbon Sequestration Estimates

The gross and net annual C sequestration values for each state were multiplied by each state's settlement area of tree cover, which was the product of the state's settlement area and the state's tree cover percentage based on NLCD developed land. The model used to calculate the total carbon sequestration amounts for each state, can be written as follows:

Equation 6-1: Net State Annual Carbon Sequestration

Net state annual C sequestration (t C/yr) = Gross state sequestration rate (t C/ha/yr) \times Net to Gross state sequestration ratio × state settlement Area (ha) × % state tree cover in settlement area

The results for all 50 states and the District of Columbia are given in Table 6-119. This approach is consistent with the default IPCC Gain-Loss methodology in IPCC (2006), although sufficient field data are not yet available to separately determine interannual gains and losses in C stocks in the living biomass of settlement trees. Instead, the methodology applied here uses estimates of net C sequestration based on modeled estimates of decomposition, as given by Nowak et al. (2013).

Table 6-119: Estimated Annual C Sequestration, Tree Cover, and Annual C Sequestration per Area of Tree Cover for settlement areas in the United States by State and the District of **Columbia (2021)**

State	Gross Annual Sequestration (Metric Tons C/Year)	Net Annual Sequestration (Metric Tons C/Year)	Tree Cover (Percent)	Gross Annual Sequestration per Area of Tree Cover (kg C/m²/Year)	Net Annual Sequestration per Area of Tree Cover (kg C/m²/Year)	Net: Gross Annual Sequestration Ratio
Alabama	2,237,744	1,630,587	53.2	0.376	0.274	0.73
Alaska	147,132	107,212	47.1	0.169	0.123	0.73
Arizona	165,651	120,706	4.5	0.388	0.283	0.73
Arkansas	1,311,140	955,394	48.6	0.362	0.264	0.73

California	2,015,600	1,468,717	16.8	0.426	0.311	0.73
Colorado	142,617	103,922	7.9	0.420	0.157	0.73
Connecticut	645,185	470,130	58.3	0.262	0.191	0.73
Delaware	101,454	73,927	24.3	0.366	0.191	0.73
DC	12,936	9,426	24.9	0.366	0.267	0.73
Florida	4,611,318	3,360,150	40.0	0.520	0.379	0.73
Georgia	3,855,749	2,809,586	56.0	0.320	0.282	0.73
Hawaii	302,417	220,363	41.4	0.637	0.464	0.73
Idaho	59,784	43,563	7.4	0.201	0.464	0.73
Illinois	670,100	488,285	7.4 15.4	0.310	0.146	0.73
Indiana	•	•		0.310	0.254	0.73
	478,924	442,841 129,682	17.0 8.5			0.92
lowa	177,970	,	8.5 10.7	0.263	0.191 0.241	0.73
Kansas	288,544	224,536		0.310		
Kentucky	983,018	716,300	36.5	0.313	0.228	0.73
Louisiana	1,579,396	1,150,865	46.7	0.435	0.317	0.73
Maine	441,832	321,952	55.2	0.242	0.176	0.73
Maryland	852,295	621,045	39.8	0.353	0.257	0.73
Massachusetts	1,087,795	792,648	56.9	0.278	0.203	0.73
Michigan	1,405,750	1,024,334	34.4	0.241	0.175	0.73
Minnesota	324,971	236,798	13.0	0.251	0.183	0.73
Mississippi	1,619,525	1,180,107	56.9	0.377	0.275	0.73
Missouri	876,489	638,675	23.0	0.313	0.228	0.73
Montana	45,227	32,956	4.8	0.201	0.147	0.73
Nebraska	97,883	82,600	7.3	0.261	0.220	0.84
Nevada	35,830	26,108	4.8	0.226	0.165	0.73
New Hampshire	389,857	284,079	58.9	0.238	0.174	0.73
New Jersey	958,420	698,376	40.5	0.321	0.234	0.73
New Mexico	189,487	138,075	10.1	0.288	0.210	0.73
New York	1,601,568	1,167,022	39.7	0.263	0.192	0.73
North Carolina	3,423,492	2,494,611	53.8	0.341	0.249	0.73
North Dakota	18,755	8,912	1.7	0.244	0.116	0.48
Ohio	1,275,219	929,220	28.1	0.271	0.198	0.73
Oklahoma	721,283	525,580	21.9	0.364	0.265	0.73
Oregon	674,215	491,283	39.6	0.265	0.193	0.73
Pennsylvania	1,896,783	1,382,137	39.9	0.267	0.195	0.73
Rhode Island	126,971	92,521	49.6	0.283	0.206	0.73
South Carolina	2,027,815	1,477,617	53.4	0.370	0.269	0.73
South Dakota	29,388	25,485	2.8	0.258	0.224	0.87
Tennessee	1,673,175	1,496,015	40.8	0.332	0.297	0.89
Texas	4,403,317	3,208,585	28.3	0.403	0.294	0.73
Utah	119,889	87,360	11.6	0.235	0.172	0.73
Vermont	186,736	136,070	50.2	0.234	0.170	0.73
Virginia	2,095,911	1,527,237	52.5	0.321	0.234	0.73
Washington	1,133,393	825,874	37.3	0.282	0.206	0.73
West Virginia	769,654	560,827	63.7	0.264	0.192	0.73
Wisconsin	711,367	518,355	25.7	0.246	0.180	0.73
Wyoming	29,597	21,566	4.7	0.199	0.145	0.73
Total	51,030,569	37,580,224				

Uncertainty

Uncertainty associated with changes in C stocks in settlement trees includes the uncertainty associated with settlement area, percent tree cover in developed land and how well it represents percent tree cover in settlement areas, and estimates of gross and net C sequestration for each of the 50 states and the District of Columbia. A 10

percent uncertainty was associated with settlement area estimates based on expert judgment. Uncertainty associated with estimates of percent settlement tree coverage for each of the 50 states was based on standard error associated with the photo-interpretation of national tree cover in developed lands. Uncertainty associated with estimates of gross and net C sequestration for each of the 50 states and the District of Columbia was based on standard error estimates for each of the state-level sequestration estimates (Table 6-120). These estimates are based on field data collected in each of the 50 states and the District of Columbia, and uncertainty in these estimates increases as they are scaled up to the national level.

Additional uncertainty is associated with the biomass models, conversion factors, and decomposition assumptions used to calculate C sequestration and emission estimates (Nowak et al. 2002). These results also exclude changes in soil C stocks, and there is likely some overlap between the settlement tree C estimates and the forest tree C estimates (e.g., Nowak et al. 2013). Due to data limitations, settlement soil flux is not quantified as part of this analysis, while reconciliation of settlement tree and forest tree estimates will be addressed through the landrepresentation effort described in the Planned Improvements section of this chapter.

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the overall uncertainty of the sequestration estimate in 2021. The results of this quantitative uncertainty analysis are summarized in Table 6-120. The change in C stocks in Settlement Trees in 2021 was estimated to be between -208.1 and -66.95 MMT CO₂ Eq. at a 95 percent confidence level. This analysis indicates a range of 51 percent more sequestration to 51 percent less sequestration than the 2021 flux estimate of -137.79 MMT CO₂ Eq.

Table 6-120: Approach 2 Quantitative Uncertainty Estimates for Net CO₂ Flux from Changes in C Stocks in Settlement Trees (MMT CO₂ Eq. and Percent)

Carras	Coo	2021 Flux Estimate	Uncer	tainty Range Rel	ative to Flux Est	imate ^a	
Source	Gas	(MMT CO ₂ Eq.)	(MMT CO ₂ Eq.)		₂ Eq.) (MMT CO ₂ Eq.) (%)		%)
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	
Changes in C Stocks in Settlement Trees	CO ₂	(137.8)	(208.1)	(67.0)	-51%	51%	

^a Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation with a 95 percent confidence interval.

Note: Parentheses indicate negative values or net sequestration.

QA/QC and Verification

Tier 1 and Tier 2 QA/QC activities were conducted consistent with the U.S. QA/QC plan. Source-specific quality control measures for settlement trees included checking input data, documentation, and calculations to ensure data were properly handled through the inventory process. Errors that were found during this process were corrected as necessary.

Recalculations Discussion

The compilation methods remained the same in the latest inventory relative to the previous Inventory. New data from the NRI and NLCD resulted in an increase in the settlement area for 2020, leading to a 5 percent increase in the net C sequestration (Table 6-121).

Table 6-121: Recalculations of the Settlement Tree Categories

Category	Previous Estimate 2020, 2022 Inventory	Current Estimate 2020, 2023 Inventory	Current Estimate 2021, 2023 Inventory
Settlement Area (km²)	447,973	466,511	469,705
Settlement Tree Coverage (km²)	143,019	150,541	151,694

Net C Flux (MMT C)	(35.4)	(37.3)	(37.6)
Net CO ₂ Flux MMT CO ₂ Eq.	(129.8)	(136.7)	(137.8)

Planned Improvements

A consistent representation of the managed land base in the United States is discussed in Section 6.1 Representation of the U.S. Land Base, and discusses a planned improvement by the USDA Forest Service to reconcile the overlap between Settlement Trees and the forest land categories. Estimates for Settlement Trees are based on tree cover in settlement areas. Work is needed to clarify how much of this settlement area tree cover may also be accounted for in "forest" area assessments as some of these forests may be adjacent to settlement areas. For example, "forest" as defined by the USDA Forest Service Forest Inventory and Analysis (FIA) program fall within urban areas. Nowak et al. (2013) estimates that 1.5 percent of forest plots measured by the FIA program fall within land designated as Census urban, suggesting that approximately 1.5 percent of the C reported in the Forest source category might also be counted in the urban areas. The potential overlap with settlement areas is unknown at this time but research is underway to develop spatially explicit and spatially continuous land representation products which will eliminate the potential for double counting. Future research may also enable more complete coverage of changes in the C stock of trees for all settlements land.

To provide more accurate emissions estimates in the future, the following actions will be taken:

- a) Photo-interpret settlement tree cover in 2021 to update tree cover estimates and trends
- b) Update photo-interpretation for settlement areas using 2016 NLCD developed land information
- c) Develop spatially explicit and spatially continuous representations of land to eliminate the overlap between forest and settlement areas, as well as allow for improved estimates in "settlement areas."

N₂O Emissions from Settlement Soils (CRF Source Category 4E1)

Of the synthetic N fertilizers applied to soils in the United States, approximately 1 to 2 percent are currently applied to lawns, golf courses, and other landscaping within settlement areas, and contributes to soil N_2O emissions. The area of settlements is considerably smaller than other land uses that are managed with fertilizer, particularly cropland soils, and therefore, settlements account for a smaller proportion of total synthetic fertilizer application in the United States. In addition to synthetic N fertilizers, a portion of surface applied biosolids (i.e., treated sewage sludge) is used as an organic fertilizer in settlement areas, and drained organic soils (i.e., soils with high organic matter content, known as *histosols*) also contribute to emissions of soil N_2O .

N additions to soils result in direct and indirect N_2O emissions. Direct emissions occur on-site due to the N additions in the form of synthetic fertilizers and biosolids as well as enhanced mineralization of N in drained organic soils. Indirect emissions result from fertilizer and biosolids N that is transformed and transported to another location in a form other than N_2O (i.e., ammonia [NH₃] and nitrogen oxide [NO_x] volatilization, nitrate [NO₃-] leaching and runoff), and later converted into N_2O at the off-site location. The indirect emissions are assigned to settlements because the management activity leading to the emissions occurred in settlements.

Total N_2O emissions from soils in Settlements Remaining Settlements⁹⁸ are 2.1 MMT CO_2 Eq. (8 kt of N_2O) in 2021. There is an overall increase of 15 percent from 1990 to 2021 due to an expanding settlement area leading to more synthetic N fertilizer applications that peaked in the mid-2000s. Inter-annual variability in these emissions is directly attributable to variability in total synthetic fertilizer consumption, area of drained organic soils, and biosolids applications in the United States. Emissions from this source are summarized in Table 6-122.

6-172 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

 $^{^{98}}$ Estimates of Soil N_2O for Settlements Remaining Settlements include emissions from Land Converted to Settlements because it was not possible to separate the activity data.

Table 6-122: N_2O Emissions from Soils in Settlements Remaining Settlements (MMT CO_2 Eq. and kt N_2O)

	1990	2005	2017	2018	2019	2020	2021
MMT CO ₂ Eq.							
Direct N ₂ O Emissions from Soils	1.5	2.2	1.6	1.7	1.7	1.7	1.7
Synthetic Fertilizers	0.8	1.5	0.7	0.8	0.8	0.8	0.8
Biosolids	0.2	0.1	0.1	0.1	0.1	0.1	0.1
Drained Organic Soils	0.5	0.6	0.7	0.7	0.7	0.7	0.7
Indirect N ₂ O Emissions from Soils	0.3	0.5	0.3	0.3	0.3	0.3	0.3
Total	1.8	2.8	1.9	2.0	2.0	2.0	2.1
kt N₂O							
Direct N ₂ O Emissions from Soils	6	8	6	6	6	6	6
Synthetic Fertilizers	3	5	3	3	3	3	3
Biosolids	1	1	1	1	1	1	1
Drained Organic Soils	2	2	3	3	3	3	3
Indirect N ₂ O Emissions from Soils	1	2	1	1	1	1	1
Total	7	10	7	7	8	8	8

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

For settlement soils, the IPCC Tier 1 approach is used to estimate soil N_2O emissions from synthetic N fertilizer, biosolids additions, and drained organic soils. Estimates of direct N_2O emissions from soils in settlements are based on the amount of N in synthetic commercial fertilizers applied to settlement soils, the amount of N in biosolids applied to non-agricultural land and surface disposal (see Section 7.2—Wastewater Treatment and Discharge for a detailed discussion of the methodology for estimating biosolids available for non-agricultural land application), and the area of drained organic soils within settlements.

Nitrogen applications to settlement soils are estimated using data compiled by the USGS (Brakebill and Gronberg 2017). The USGS estimated on-farm and non-farm fertilizer use is based on sales records at the county level from 1987 through 2012 (Brakebill and Gronberg 2017). Non-farm N fertilizer is assumed to be applied to settlements and forest lands; values for 2013 through 2017 are based on 2012 values adjusted for total annual total N fertilizer sales in the United States (AAPFCO 2016 through 2022) because there are no activity data on non-farm application after 2012. Settlement application is calculated by subtracting forest application from total non-farm fertilizer use. The amount of synthetic fertilization from 2018 to 2021 is determined using a linear extrapolation method (See Box 6-4 in Cropland Remaining Cropland). This method is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2017 fertilization data, and linear extrapolation. The total amount of fertilizer N applied to settlements is multiplied by the IPCC default emission factor (1 percent) to estimate direct N₂O emissions (IPCC 2006) for 1990 to 2021.

Biosolids applications are derived from national data on biosolids generation, disposition, and N content (see Section 7.2, Wastewater Treatment for further detail). The total amount of N resulting from these sources is multiplied by the IPCC default emission factor for applied N (one percent) to estimate direct N_2O emissions (IPCC 2006) for 1990 to 2021.

The IPCC (2006) Tier 1 method is also used to estimate direct N₂O emissions due to drainage of organic soils in settlements at the national scale. Estimates of the total area of drained organic soils are obtained from the 2015 NRI (USDA-NRCS 2018) using soils data from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2011). To estimate annual emissions from 1990 to 2015, the total area is multiplied by the IPCC default emission factor for temperate regions (IPCC 2006). This Inventory does not include soil N₂O emissions from drainage of organic soils in Alaska and federal lands, although this is a planned improvement for a future Inventory.

For indirect emissions, the total N applied from fertilizer and biosolids is multiplied by the IPCC default factors of 10 percent for volatilization and 30 percent for leaching/runoff to calculate the amount of N volatilized and the

amount of N leached/runoff. The amount of N volatilized is multiplied by the IPCC default factor of one percent for the portion of volatilized N that is converted to N₂O off-site and the amount of N leached/runoff is multiplied by the IPCC default factor of 0.075 percent for the portion of leached/runoff N that is converted to N₂O off-site. The resulting estimates are summed to obtain total indirect emissions from 1990 to 2021 for biosolids and synthetic fertilization.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2021 for biosolids. For synthetic fertilizer, a linear extrapolation method is used to approximate fertilizer application for the remainder of the 2018 to 2021 time series and then used to estimate emissions. For drainage of organic soils, the methods described above are applied for 1990 to 2015, and a linear extrapolation method is used to approximate emissions for the remainder of the 2016 to 2021 time series (See Box 6-4 in Cropland Remaining Cropland). The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and, and is a standard data splicing method for imputing missing emissions data in a time series (IPCC 2006). The time series will be recalculated in a future Inventory with the methods described previously for drainage of organic soils.

Uncertainty

The amount of N₂O emitted from settlement soils depends not only on N inputs and area of drained organic soils, but also on a large number of variables that can influence rates of nitrification and denitrification, including organic C availability; rate, application method, and timing of N input; oxygen gas partial pressure; soil moisture content; pH; temperature; and irrigation/watering practices. The effect of the combined interaction of these variables on N₂O emissions is complex and highly uncertain. The IPCC default methodology does not explicitly incorporate these variables, except variation in the total amount of fertilizer N and biosolids application, which leads to uncertainty in the results.

Uncertainties exist in both the fertilizer N and biosolids application rates in addition to the emission factors. Uncertainty in fertilizer N application is assigned a default level of ±50 percent. 99 Uncertainty in the area of drained organic soils is based on the estimated variance from the NRI survey (USDA-NRCS 2018). There is also additional uncertainty associated with the fit of the linear regression model for the data splicing methods that was used to estimate emissions associated with drainage of organic soils.

Uncertainty is propagated through the calculations of N₂O emissions from fertilizer N and drainage of organic soils based on a Monte Carlo analysis. The results are combined with the uncertainty in N₂O emissions from the biosolids application using simple error propagation methods (IPCC 2006). The results are summarized in Table 6-123. Direct N₂O emissions from soils in Settlements Remaining Settlements in 2021 are estimated to be between 0.7 and 3.1 MMT CO₂ Eq. at a 95 percent confidence level. This indicates a range of 57 percent below to 85 percent above the 2021 emission estimate of 1.7 MMT CO₂ Eq. Indirect N₂O emissions in 2021 are between 0.1 and 1.0 MMT CO₂ Eq., ranging from 78 percent below to 223 percent above the estimate of 0.3 MMT CO₂ Eq.

Table 6-123: Quantitative Uncertainty Estimates of N₂O Emissions from Soils in Settlements Remaining Settlements (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emissions (MMT CO ₂ Eq.)		ty Range Relat CO₂ Eq.)	ive to Emission (9	Estimate ^a %)
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Settlements Remaining Settleme	nts					
Direct N ₂ O Emissions from Soils	N_2O	1.7	0.7	3.1	-57%	85%

 $^{^{99}}$ No uncertainty is provided with the USGS fertilizer consumption data (Brakebill and Gronberg 2017) so a conservative ± 50 percent is used in the analysis. Biosolids data are also assumed to have an uncertainty of ±50 percent.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 699 of 1050 PageID 4147

Indirect N ₂ O Emissions from Soils	N_2O	0.3	0.1	1.0	-78%	223%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval. Note: These estimates include direct and indirect N₂O emissions from Settlements Remaining Settlements and Land Converted to Settlements because it was not possible to separate the activity data.

QA/QC and Verification

The spreadsheet containing fertilizer, drainage of organic soils, and biosolids applied to settlements and calculations for N_2O and uncertainty ranges have been checked. An error was found in the uncertainty calculation and also some links in the spreadsheets that were causing errors. These errors were corrected.

Recalculations Discussion

Recalculations are associated with updated estimates for total fertilizers sales in a new AAPFCO report (AAPFCO 2022), along with revisions to the estimates derived from the linear extrapolation method.

EPA also updated the global warming potential (GWP) for calculating CO₂-equivalent emissions of N₂O (from 298 to 265) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series.

As a result, calculated CO_2 -equivalent total N_2O emissions from settlement soils have decreased by an average value of 0.3 MMT CO_2 Eq. across the time series. This represents a 12 percent decrease in emissions compared to the previous Inventory.

Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

This source will be extended to include soil N_2O emissions from drainage of organic soils in settlements of Alaska and federal lands in order to provide a complete inventory of emissions for this category. In addition, this Inventory needs to be updated with the latest land use data from the USDA National Resources Inventory (See Planned Improvements in Settlements Remaining Settlements). Data on fertilizer amounts from 2018 to 2021 and latest area data on drained organic soils will be incorporated into a future Inventory and used to recalculate the time series.

Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (CRF Category 4E1)

In the United States, yard trimmings (i.e., grass clippings, leaves, and branches) and food scraps account for a significant portion of the municipal waste stream, and a large fraction of the collected yard trimmings and food scraps are put in landfills. A portion of the carbon (C) contained in landfilled yard trimmings and food scraps can be stored for very long periods.

Carbon storage estimates within the Inventory are associated with particular land uses. For example, harvested wood products are reported under Forest Land Remaining Forest Land because these wood products originated from the forest ecosystem. Similarly, C stock changes in yard trimmings and food scraps are reported under Settlements Remaining Settlements because the bulk of the C, which comes from yard trimmings, originates from settlement areas. While the majority of food scraps originate from cropland and grassland, in this Inventory they are reported with the yard trimmings in the Settlements Remaining Settlements section. Additionally, landfills are considered part of the managed land base under settlements (see Section 6.1 Representation of the U.S. Land

Base), and reporting these C stock changes that occur entirely within landfills fits most appropriately within the Settlements Remaining Settlements section. The CH₄ emissions resulting from anaerobic decomposition of yard trimmings and food scraps in landfills are reported in the Waste chapter, see Section 7.1—Landfills.

The estimated amount of yard trimmings collected annually has stagnated since 1990 and the fraction that is landfilled has been declining since 1990. From 1970 to 1990, yard trimmings collected for disposal increased by about 51 percent. In 1990, over 53 million metric tons (wet weight) of yard trimmings and food scraps are estimated to have been generated (i.e., put at the curb for collection to be taken to disposal sites or to composting facilities) (EPA 2020). Since then, programs banning or discouraging yard trimmings disposal to landfills have led to an increase in backyard composting and the use of mulching mowers, and consequently a slowing of year-over-year increases in the tonnage of yard trimmings generated. From 1990 to 2021, yard trimmings collected for disposal are estimated to have increased 1.1. percent. At the same time, an increase in the number of municipal composting facilities has reduced the proportion of collected yard trimmings that are discarded in landfills per year—from 72 percent in 1990 to 30 percent in 2021. The net effect of the slight increase in generation and the increase in composting is a 58 percent decrease in the quantity of yard trimmings disposed of in landfills since 1990. Composting trends and emissions estimations are presented in the Waste chapter, Section 7.3 Composting.

Food scrap generation has grown by an estimated 165 percent since 1990. Though the proportion of total food scraps generated that are eventually discarded in landfills has decreased from an estimated 82 percent in 1990 to 55 percent in 2020, the tonnage disposed of in landfills has increased considerably (by an estimated 78 percent) due to the increase in food scrap generation. Although the total tonnage of food scraps disposed of in landfills has increased from 1990 to 2021, the difference in the amount of food scraps added from one year to the next generally decreased, and consequently the annual carbon stock *net changes* from food scraps have generally decreased as well (as shown in Table 6-124 and Table 6-125). Landfilled food scraps decompose over time, producing CH₄ and CO₂. Decomposition happens at a higher rate initially, then decreases. As decomposition decreases, the carbon stock becomes more stable. Because the cumulative carbon stock left in the landfill from previous years is (1) not decomposing as much as the carbon introduced from food scraps in a single more recent year; and (2) is much larger than the carbon introduced from food scraps in a single more recent year, the total carbon stock in the landfill is primarily driven by the more stable "older" carbon stock, thus resulting in decreasing annual changes in later years.

Overall, the decrease in the landfill disposal rate of yard trimmings has more than compensated for the increase in food scrap disposal in landfills, and the net result is a decrease in the annual net change in landfill C storage from 24.5 MMT CO_2 Eq. (6.7 MMT C) in 1990 to 12.6 MMT CO_2 Eq. (3.4 MMT C) in 2021 (Table 6-124 and Table 6-125), a decrease of 51 percent over the time series.

Table 6-124: Net Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (MMT CO_2 Eq.)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Yard Trimmings	(20.1)	(7.5)	(8.3)	(8.3)	(8.2)	(8.2)	(8.1)
Grass	(1.7)	(0.6)	(0.8)	(8.0)	(0.8)	(0.8)	(0.7)
Leaves	(8.7)	(3.4)	(3.8)	(3.8)	(3.8)	(3.8)	(3.7)
Branches	(9.8)	(3.4)	(3.7)	(3.7)	(3.7)	(3.7)	(3.6)
Food Scraps	(4.4)	(3.9)	(5.6)	(5.2)	(4.8)	(4.5)	(4.5)
Total Net Flux	(24.5)	(11.4)	(13.8)	(13.4)	(13.1)	(12.8)	(12.6)

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-125: Net Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (MMT C)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Yard Trimmings	(5.5)	(2.0)	(2.3)	(2.3)	(2.2)	(2.2)	(2.2)
Grass	(0.5)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Leaves	(2.4)	(0.9)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)

Branches	(2.7)	(0.9)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
Food Scraps	(1.2)	(1.1)	(1.5)	(1.4)	(1.3)	(1.2)	(1.2)
Total Net Flux	(6.7)	(3.1)	(3.8)	(3.7)	(3.6)	(3.5)	(3.4)

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Methodology and Time-Series Consistency

When wastes of biogenic origin (such as yard trimmings and food scraps) are landfilled and do not completely decompose, the C that remains is effectively removed from the C cycle. Empirical evidence indicates that yard trimmings and food scraps do not completely decompose in landfills (Barlaz 1998, 2005, 2008; De la Cruz and Barlaz 2010), and thus the stock of C in landfills can increase, with the net effect being a net atmospheric removal of C. Estimates of net C flux resulting from landfilled yard trimmings and food scraps were developed by estimating the change in landfilled C stocks between inventory years and uses a country-specific methodology based on the methodology for estimating the amount of harvested wood products stored in solid waste disposal systems that is provided in the Land Use, Land-Use Change, and Forestry sector in IPCC (2003) and the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2006). Carbon stock estimates were calculated by determining the mass of landfilled C resulting from yard trimmings and food scraps discarded in a given year; adding the accumulated landfilled C from previous years; and subtracting the mass of C that was landfilled in previous years and has since decomposed and been emitted as CO₂ and CH₄.

To determine the total landfilled C stocks for a given year, the following data and factors were assembled:

- (1) The composition of the yard trimmings (i.e., the proportion of grass, leaves and branches);
- (2) The mass of yard trimmings and food scraps discarded in landfills;
- (3) The C storage factor of the landfilled yard trimmings and food scraps; and
- (4) The rate of decomposition of the degradable C.

The composition of yard trimmings was assumed to be 30 percent grass clippings, 40 percent leaves, and 30 percent branches on a wet weight basis (Oshins and Block 2000). The yard trimmings were subdivided, because each component has its own unique adjusted C storage factor (i.e., moisture content and C content) and rate of decomposition. The mass of yard trimmings and food scraps disposed of in landfills was estimated by multiplying the quantity of yard trimmings and food scraps discarded by the proportion of discards managed in landfills. Data on discards (i.e., the amount generated minus the amount diverted to centralized composting facilities) for both yard trimmings and food scraps were taken primarily from *Advancing Sustainable Materials Management: Facts and Figures 2018* (EPA 2020), which provides data for 1960, 1970, 1980, 1990, 2000, 2005, 2010, 2015, 2017 and 2018. To provide data for some of the missing years, detailed backup data were obtained from the 2012, 2013, and 2014, 2015, and 2017 versions of the *Advancing Sustainable Materials Management: Facts and Figures* reports (EPA 2019), as well as historical data tables that EPA developed for 1960 through 2012 (EPA 2016). Remaining years in the time series for which data were not provided were estimated using linear interpolation. Since the *Advancing Sustainable Materials Management: Facts and Figures* reports for 2019, 2020, and 2021 were unavailable, landfilled material generation, recovery, and disposal data for 2019, 2020, and 2021 were proxied equal to 2018 values.

The amount of C disposed of in landfills each year, starting in 1960, was estimated by converting the discarded landfilled yard trimmings and food scraps from a wet weight to a dry weight basis, and then multiplying by the initial (i.e., pre-decomposition) C content (as a fraction of dry weight). The dry weight of landfilled material was calculated using dry weight to wet weight ratios (Tchobanoglous et al. 1993, cited by Barlaz 1998) and the initial C contents and the C storage factors were determined by Barlaz (1998, 2005, 2008).

The amount of C remaining in the landfill for each subsequent year was tracked based on a simple model of C fate based on a laboratory experiment simulating decomposition of landfilled biogenic materials by methanogenic microbes (Barlaz 1998, 2005, 2008). Carbon remaining in landfilled materials is expressed as a proportion of initial C content, shown in the row labeled "C Storage Factor, Proportion of Initial C Stored (%)" in Table 6-126.

The modeling approach applied to simulate U.S. landfill C flows builds on the findings of Barlaz (1998, 2005, 2008). The proportion of C stored is assumed to persist in landfills. The remaining portion is assumed to degrade over time, resulting in emissions of CH₄ and CO₂. ¹⁰⁰ The degradable portion of the C is assumed to decay according to first-order kinetics. The decay rates for each of the materials are shown in Table 6-126.

The first-order decay rates, k, for each waste component are derived from De la Cruz and Barlaz (2010):

- De la Cruz and Barlaz (2010) calculate first-order decay rates using laboratory data published in Eleazer et al. (1997), and a correction factor, f, is calculated so that the weighted average decay rate for all components is equal to the EPA AP-42 default decay rate (0.04) for mixed MSW for regions that receive more than 25 inches of rain annually (EPA 1995). Because AP-42 values were developed using landfill data from approximately 1990, De la Cruz and Barlaz used 1990 waste composition for the United States from EPA's Characterization of Municipal Solid Waste in the United States: 1990 Update (EPA 1991) to calculate f. De la Cruz and Barlaz multiplied this correction factor by the Eleazer et al. (1997) decay rates of each waste component to develop field-scale first-order decay rates.
- De la Cruz and Barlaz (2010) also use other assumed initial decay rates for mixed MSW in place of the AP-42 default value based on different types of environments in which landfills in the United States are located, including dry conditions (less than 25 inches of rain annually, k=0.02) and bioreactor landfill conditions (moisture is controlled for rapid decomposition, k=0.12).

Similar to the methodology in the Landfills section of the Inventory (Section 7.1), which estimates CH₄ emissions, the overall MSW decay rate is estimated by partitioning the U.S. landfill population into three categories based on annual precipitation ranges of: (1) Less than 20 inches of rain per year, (2) 20 to 40 inches of rain per year, and (3) greater than 40 inches of rain per year. These correspond to overall MSW decay rates of 0.020, 0.038, and 0.057 year⁻¹, respectively. De la Cruz and Barlaz (2010) calculate component-specific decay rates corresponding to the first value (0.020 year⁻¹), but not for the other two overall MSW decay rates.

To maintain consistency between landfill-related methodologies across the Inventory, EPA developed correction factors (f) for decay rates of 0.038 and 0.057 year-1 through linear interpolation. A weighted national average component-specific decay rate is calculated by assuming that waste generation is proportional to population (the same assumption used in the landfill methane emission estimate), based on population data from the 2000 U.S. Census. The percent of census population is calculated for each of the three categories of annual precipitation (noted in the previous paragraph); the population data are used as a surrogate for the number of landfills in each annual precipitation category. Precipitation range percentages weighted by population are updated over time as new Census data are available, to remain consistent with percentages used in the Waste chapter, Section 7.1 Landfills. The component-specific decay rates are shown in Table 6-126.

De la Cruz and Barlaz (2010) also use other assumed initial decay rates for mixed MSW in place of the AP-42 default value based on different types of environments in which landfills in the United States are located, including dry conditions (less than 25 inches of rain annually, k=0.02) and bioreactor landfill conditions (moisture is controlled for rapid decomposition, k=0.12).

For each of the four materials (grass, leaves, branches, food scraps), the stock of C in landfills for any given year is calculated according to Equation 6-2:

Equation 6-2: Total C Stock for Yard Trimmings and Food Scraps in Landfills

$$LFC_{i,t} = \sum_{n=0}^{t} W_{i,n} \times (1 - MC_i) \times ICC_i \times \{ [CS_i \times ICC_i] + [(1 - (CS_i \times ICC_i)) \times e^{-k(t-n)}] \}$$

¹⁰⁰ The CH₄ emissions resulting from anaerobic decomposition of yard trimmings and food scraps in landfills are reported in the Waste chapter, Section 7.1 Landfills.

where,

t = Year for which C stocks are being estimated (year),

i = Waste type for which C stocks are being estimated (grass, leaves, branches, food

scraps),

 $LFC_{i,t}$ = Stock of C in landfills in year t, for waste i (metric tons),

 $W_{i,n}$ = Mass of waste *i* disposed of in landfills in year *n* (metric tons, wet weight),

n = Year in which the waste was disposed of (year, where 1960 < n < t),

 MC_i = Moisture content of waste i (percent of water),

 CS_i = Proportion of initial C that is stored for waste i (percent),

ICCi = Initial C content of waste i (percent),

e = Natural logarithm, and

k = First-order decay rate for waste i, (year⁻¹).

For a given year t, the total stock of C in landfills ($TLFC_t$) is the sum of stocks across all four materials (grass, leaves, branches, food scraps). The annual flux of C in landfills (F_t) for year t is calculated in as the change in C stock compared to the preceding year according to Equation 6-3:

Equation 6-3: C Stock Annual Flux for Yard Trimmings and Food Scraps in Landfills

$$F_t = TLFC_t - TLFC_{(t-1)}$$

Thus, as seen in Equation 6-2, the C placed in a landfill in year n is tracked for each year t through the end of the inventory period. For example, disposal of food scraps in 1960 resulted in depositing about 1,135,000 metric tons of C in landfills. Of this amount, 16 percent (179,000 metric tons) is persistent; the remaining 84 percent (956,000 metric tons) is degradable. By 1965, more than half of the degradable portion (507,000 metric tons) decomposes, leaving a total of 628,000 metric tons (the persistent portion, plus the remainder of the degradable portion).

Continuing the example, by 2021, the total food scraps C originally disposed of in 1960 had declined to 179,000 metric tons (i.e., virtually all degradable C had decomposed). By summing the C remaining from 1960 with the C remaining from food scraps disposed of in subsequent years (1961 through 2021), the total landfill C from food scraps in 2021 was 50.9 million metric tons. This value is then added to the C stock from grass, leaves, and branches to calculate the total landfill C stock in 2021, yielding a value of 289.2 million metric tons (as shown in Table 6-127). In the same way total net flux is calculated for forest C and harvested wood products, the total net flux of landfill C for yard trimmings and food scraps for a given year (Table 6-125) is the difference in the landfill C stock for the following year and the stock in the current year. For example, the net change in 2021 shown in Table 6-125 (3.4 MMT C) is equal to the stock in 2022 (292.7 MMT C) minus the stock in 2021 (289.2 MMT C). The C stocks calculated through this procedure are shown in Table 6-127.

To develop the 2022 C stock estimate, estimates of yard trimming and food scrap carbon stocks were forecasted for 2022, based on data from 1990 through 2021. These forecasted values were used to calculate net changes in carbon stocks for 2021. Excel's FORECAST.ETS function was used to predict a 2022 value using historical data via an algorithm called "Exponential Triple Smoothing." This method determined the overall trend and provided appropriate carbon stock estimates for 2022.

Table 6-126: Moisture Contents, C Storage Factors (Proportions of Initial C Sequestered), Initial C Contents, and Decay Rates for Yard Trimmings and Food Scraps in Landfills

Variable	,	Food Corons		
variable	Grass	Leaves	Branches	Food Scraps
Moisture Content (% H ₂ O)	70	30	10	70

C Storage Factor, Proportion of Initial C				
Stored (%)	53	85	77	16
Initial C Content (%)	45	46	49	51
Decay Rate (year-1)	0.313	0.179	0.015	0.151

Note: The decay rates are presented as weighted averages based on annual precipitation categories and population residing in each precipitation category.

Table 6-127: C Stocks in Yard Trimmings and Food Scraps in Landfills (MMT C)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021	2022a
Yard Trimmings	156.0	203.1	229.4	231.6	233.9	236.1	238.4	240.6
Branches	14.6	18.1	20.5	20.7	20.9	21.1	21.3	21.5
Leaves	66.7	87.4	99.4	100.4	101.5	102.5	103.6	104.6
Grass	74.7	97.7	109.5	110.5	111.5	112.5	113.5	114.4
Food Scraps	17.9	33.2	45.4	46.9	48.3	49.6	50.9	52.1
Total Carbon Stocks	173.9	236.3	274.8	278.5	282.2	285.7	289.2	292.7

^a 2022 C stock estimate was forecasted using 1990 to 2021 data.

Note: Totals may not sum due to independent rounding.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. When available, the same data source was used across the entire time series for the analysis. When data were unavailable, missing values were estimated using linear interpolation or forecasting, as noted above.

Uncertainty

The uncertainty analysis for landfilled yard trimmings and food scraps includes an evaluation of the effects of uncertainty for the following data and factors: disposal in landfills per year (tons of C), initial C content, moisture content, decay rate, and proportion of C stored. The C storage landfill estimates are also a function of the composition of the yard trimmings (i.e., the proportions of grass, leaves and branches in the yard trimmings mixture). There are respective uncertainties associated with each of these factors.

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the overall uncertainty of the sequestration estimate for 2021. The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 6-128. Total yard trimmings and food scraps CO_2 flux in 2021 was estimated to be between -21.6 and -5.5 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 72 percent below to 56 percent above the 2021 flux estimate of -12.6 MMT CO_2 Eq.

Table 6-128: Approach 2 Quantitative Uncertainty Estimates for CO₂ Flux from Yard Trimmings and Food Scraps in Landfills (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Flux Estimate	Uncert	ainty Range Rel	ative to Flux Es	timatea	
		(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)		
			Lower	Upper	Lower	Upper	
			Bound	Bound	Bound	Bound	
Yard Trimmings and Food	60	(12.6)	(21.6)	/⊏ ⊏\	720/	F.C0/	
Scraps	CO_2	(12.6)	(21.6)	(5.5)	-72%	56%	

^a Range of flux estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval. Note: Parentheses indicate negative values or net C sequestration.

QA/QC and Verification

Tier 1 and Tier 2 QA/QC activities were conducted consistent with the U.S. QA/QC plan. Source-specific quality control measures for Landfilled Yard Trimmings and Food Scraps included checking that input data were properly

transposed within the spreadsheet, checking calculations were correct, and confirming that all activity data and calculations documentation was complete and updated to ensure data were properly handled through the inventory process.

Order of magnitude checks and checks of time-series consistency were performed to ensure data were updated correctly and any changes in emissions estimates were reasonable and reflected changes in activity data. An annual change trend analysis was also conducted to ensure the validity of the emissions estimates. Errors that were found during this process were corrected as necessary.

To ensure consistency across the LULUCF and Waste sectors, and the accuracy of emissions, EPA plans to perform a comparison of the activity data used and carbon inputs between the Landfilled Yard Trimmings and Food Scraps, and the Waste chapter, Section 7.1—Landfills categories.

Recalculations Discussion

No recalculations were performed for the 1990-2021 inventory, as the Advancing Sustainable Materials Management: Facts and Figures report for 2019, 2020, and 2021 were not yet available.

Planned Improvements

EPA notes the following improvements may be implemented or investigated within the next two or three inventory cycles pending time and resource constraints:

- MSW data more recent than 2018 have not been released through the Advancing Sustainable Materials Management reports. EPA will monitor the release schedule for these data and evaluate data for integration into the Inventory when released. Six new food waste management pathways were introduced in the 2018 Advancing Sustainable Materials Management report. Time series data for all of these pathways are not provided prior to 2018 but EPA plans to investigate potential data sources and/or methods to address time-series consistency and apply these data to the time series.
- EPA has been made aware of inconsistencies in landfilled food scraps data reported to the EPA Greenhouse Gas Reporting Program (GHGRP) and will evaluate changes to how landfilled and energy recovery values for yard trimmings and food scraps are calculated.

EPA notes the following improvements will continued to be investigated as time and resources allow, but there are no immediate plans to implement these improvements until data are available or identified:

- EPA also plans to continue to investigate updates to the decay rate estimates for food scraps, leaves, grass, and branches, as well as evaluate using decay rates that vary over time based on Census population and climate data changes over time. Currently the inventory calculations use 2010 U.S. Census data, but 2020 U.S. Census data may be available.
- Other improvements include investigation into yard waste composition to determine if changes need to be made based on changes in residential practices. A review of available literature will be conducted to determine if there are changes in the allocation of yard trimmings. For example, leaving grass clippings in place is becoming a more common practice, thus reducing the percentage of grass clippings in yard trimmings disposed in landfills. In addition, agronomists may be consulted for determining the mass of grass per acre on residential lawns to provide an estimate of total grass generation for comparison with Inventory estimates.
- EPA will continue to evaluate data from recent peer-reviewed literature that may modify the default C storage factors, initial C contents, and decay rates for yard trimmings and food scraps in landfills particularly updates to population precipitation ranges used to calculate k values. Based upon this evaluation, changes may be made to the default values.

Finally, EPA plans to review available data to ensure all types of landfilled yard trimmings and food scraps
are being included in the Inventory estimates, such as debris from road construction and commercial food
waste not included in other Inventory estimates.

6.11 Land Converted to Settlements (CRF Category 4E2)

Land Converted to Settlements includes all settlements in an Inventory year that had been in another land use(s) during the previous 20 years (USDA-NRCS 2015). ¹⁰¹ For example, cropland, grassland or forest land converted to settlements during the past 20 years would be reported in this category. Converted lands are retained in this category for 20 years as recommended by IPCC (2006).

Land use change can lead to large losses of carbon (C) to the atmosphere, particularly conversions from forest land (Houghton et al. 1983). Moreover, conversion of forest to another land use (i.e., deforestation) is one of the largest anthropogenic sources of emissions to the atmosphere globally (Schimel 1995), although this source may be declining globally (Tubiello et al. 2015). IPCC (2006) recommends reporting changes in biomass, dead organic matter, and soil organic C stocks due to land-use change. All soil organic C stock changes are estimated and reported for Land Converted to Settlements, but there is limited reporting of other pools in this Inventory. Loss of aboveground and belowground biomass, dead wood and litter C are reported for Forest Land Converted to Settlements and Woodlands associated with Grasslands Converted to Settlements, but not for other land-use conversions to settlements.

There are discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Land Converted to Settlements. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Land Converted to Settlements Inventory. Second, this Inventory includes all settlements in the conterminous United States and Hawaii, but does not include settlements in Alaska. Areas of drained organic soils in settlements on federal lands are also not included in this Inventory. These differences lead to discrepancies between the managed area in Land Converted to Settlements and the settlement area included in the Inventory analysis (Table 6-128). There is a planned improvement to include CO₂ emissions from drainage of organic soils in settlements of Alaska and federal lands as part of a future Inventory (See Planned Improvements Section).

Forest Land Converted to Settlements is the largest source of emissions from 1990 to 2021, accounting for approximately 75 percent of the average total loss of C among all of the land-use conversions in Land Converted to Settlements. Total losses of aboveground and belowground biomass, dead wood and litter C losses in 2021 for all conversions are 38.9, 7.4, 6.6, and 9.7 MMT CO_2 Eq., respectively (10.6, 2.0, 1.8, and 2.6 MMT C). Mineral and organic soils also lost 16.1 and 2.4 MMT CO_2 Eq. in 2021 (4.4 and 0.6 MMT C). The total net flux is 81.0 MMT CO_2 Eq. in 2021 (22.1 MMT C), which is a 30 percent increase in CO_2 emissions compared to the emissions in the initial reporting year of 1990 (Table 6-129 and Table 6-130). The main driver of net emissions for this source category is the conversion of forest land to settlements, with large losses of biomass, deadwood and litter C.

6-182 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

¹⁰¹ NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 2001. This may have led to an underestimation of Land Converted to Settlements in the early part of the time series to the extent that some areas are converted to settlements from 1971 to 1978.

Table 6-129: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Settlements (MMT CO₂ Eq.)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to							
Settlements	3.4	9.8	6.0	5.9	5.9	5.9	5.9
Mineral Soils	2.8	8.4	5.2	5.2	5.1	5.1	5.1
Organic Soils	0.6	1.3	0.8	0.8	0.8	0.8	0.8
Forest Land Converted to							
Settlements	53.4	59.0	63.5	63.7	63.8	63.7	63.7
Aboveground Live Biomass	32.5	35.3	38.1	38.3	38.3	38.3	38.3
Belowground Live Biomass	6.2	6.8	7.3	7.3	7.3	7.3	7.3
Dead Wood	5.4	5.9	6.4	6.4	6.4	6.4	6.4
Litter	8.0	8.7	9.5	9.5	9.5	9.5	9.5
Mineral Soils	1.1	2.0	1.9	1.9	1.9	1.9	1.9
Organic Soils	0.2	0.3	0.3	0.3	0.3	0.3	0.3
Grassland Converted to							
Settlements	6.0	17.1	12.3	12.2	12.2	12.2	12.2
Aboveground Live Biomass	0.4	0.5	0.5	0.5	0.5	0.5	0.5
Belowground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Wood	0.1	0.1	0.2	0.2	0.2	0.2	0.2
Litter	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Mineral Soils	4.6	14.9	10.4	10.4	10.4	10.3	10.3
Organic Soils	0.6	1.4	0.9	0.9	0.9	0.9	0.9
Other Lands Converted to							
Settlements	(0.4)	(1.4)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)
Mineral Soils	(0.4)	(1.6)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Organic Soils	+	0.2	0.1	0.1	0.1	0.1	0.1
Wetlands Converted to							
Settlements	+	0.5	0.4	0.4	0.4	0.3	0.3
Mineral Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Organic Soils	+	0.4	0.3	0.3	0.3	0.3	0.3
Total Aboveground Biomass Flux	32.9	35.8	38.7	38.8	38.9	38.9	38.9
Total Belowground Biomass Flux	6.3	6.8	7.4	7.4	7.4	7.4	7.4
Total Dead Wood Flux	5.5	6.0	6.5	6.5	6.6	6.6	6.6
Total Litter Flux	8.2	8.9	9.7	9.7	9.7	9.7	9.7
Total Mineral Soil Flux	8.1	23.8	16.2	16.2	16.2	16.2	16.1
Total Organic Soil Flux	1.4	3.6	2.4	2.4	2.4	2.4	2.4
Total Net Flux	62.5	85.0	80.9	81.0	81.1	81.0	81.0

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-130: Net CO₂ Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Settlements (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to							
Settlements	0.9	2.7	1.6	1.6	1.6	1.6	1.6
Mineral Soils	0.8	2.3	1.4	1.4	1.4	1.4	1.4
Organic Soils	0.2	0.4	0.2	0.2	0.2	0.2	0.2
Forest Land Converted to							
Settlements	14.6	16.1	17.3	17.4	17.4	17.4	17.4
Aboveground Live Biomass	8.9	9.6	10.4	10.4	10.5	10.5	10.5
Belowground Live Biomass	1.7	1.8	2.0	2.0	2.0	2.0	2.0
Dead Wood	1.5	1.6	1.7	1.7	1.7	1.7	1.7
Litter	2.2	2.4	2.6	2.6	2.6	2.6	2.6
Mineral Soils	0.3	0.5	0.5	0.5	0.5	0.5	0.5

Organic Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Grassland Converted to							
Settlements	1.6	4.7	3.3	3.3	3.3	3.3	3.3
Aboveground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	10.0
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	+	+	+	+	+	+	+
Litter	+	0.1	0.1	0.1	0.1	0.1	0.1
Mineral Soils	1.3	4.1	2.8	2.8	2.8	2.8	2.8
Organic Soils	0.2	0.4	0.2	0.2	0.2	0.2	0.2
Other Lands Converted to							
Settlements	(0.1)	(0.4)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Mineral Soils	(0.1)	(0.4)	(0.4)	(0.4)	(0.3)	(0.3)	(0.3)
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to							
Settlements	+	0.1	0.1	0.1	0.1	0.1	0.1
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Total Aboveground Biomass Flux	9.0	9.8	10.5	10.6	10.6	10.6	10.6
Total Belowground Biomass Flux	1.7	1.9	2.0	2.0	2.0	2.0	2.0
Total Dead Wood Flux	1.5	1.6	1.8	1.8	1.8	1.8	1.8
Total Litter Flux	2.2	2.4	2.6	2.6	2.6	2.6	2.6
Total Mineral Soil Flux	2.2	6.5	4.4	4.4	4.4	4.4	4.4
Total Organic Soil Flux	0.4	1.0	0.7	0.6	0.6	0.6	0.6
Total Net Flux	17.0	23.2	22.1	22.1	22.1	22.1	22.1

⁺ Absolute value does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Land Converted to Settlements, including (1) loss of aboveground and belowground biomass, dead wood and litter C with conversion to settlements from forest lands and woodlands designated in the grassland, as well as (2) the impact from all land-use conversions to settlements on soil organic C stocks in mineral and organic soils.

Biomass, Dead Wood, and Litter Carbon Stock Changes

A Tier 2 method is applied to estimate biomass, dead wood, and litter C stock changes for Forest Land Converted to Settlements and woodlands associated with Grassland Converted to Settlements. Estimates are calculated in the same way as those in the Forest Land Remaining Forest Land category using data from the USDA Forest Service, Forest Inventory and Analysis (FIA) program (USDA Forest Service 2022), however there is no country-specific data for settlements so the biomass, litter, and dead wood carbon stocks on these converted lands were assumed to be zero. The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion.

If FIA plots include data on individual trees, aboveground and belowground C density estimates are based on Woodall et al. (2011). Aboveground and belowground biomass estimates also include live understory, which is a minor component of biomass defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density are based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003).

This inventory also includes estimates of change in dead organic matter for standing dead, deadwood and litter. If FIA plots include data on standing dead trees, standing dead tree C density is estimated following the basic method applied to live trees (Woodall et al. 2011) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). If FIA plots include data on downed dead wood, downed dead wood C

density is estimated based on measurements of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots is measured for litter C. If FIA plots include litter material, a modeling approach using litter C measurements from FIA plots is used to estimate litter C density (Domke et al. 2016).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2021 so that changes reflect anthropogenic activity and not methodological adjustments. See Annex 3.13 for more information about reference C density estimates for forest land and the compilation system used to estimate carbon stock changes from forest land.

Soil Carbon Stock Changes

Soil organic C stock changes are estimated for Land Converted to Settlements according to land use histories recorded in the 2015 USDA NRI survey for non-federal lands (USDA-NRCS 2018). Land use and some management information were originally collected for each NRI survey location on a 5-year cycle beginning in 1982. In 1998, the NRI program began collecting annual data, and the annual data have been incorporated from the NRI into the inventory analysis through 2015 (USDA-NRCS 2018).

NRI survey locations are classified as Land Converted to Settlements in a given year between 1990 and 2015 if the land use is settlements but had been classified as another use during the previous 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an underestimation of Land Converted to Settlements in the early part of the time series to the extent that some areas are converted to settlement between 1971 and 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 2 method (Ogle et al. 2003) is applied to estimate C stock changes for Land Converted to Settlements on mineral soils from 1990 to 2015. Data on climate, soil types, land use, and land management activity are used to classify land area and apply appropriate stock change factors (Ogle et al. 2003, 2006). Reference C stocks are estimated using the National Soil Survey Characterization Database (USDA-NRCS 1997) with cultivated cropland as the reference condition, rather than native vegetation as used in IPCC (2006). Soil measurements under agricultural management are much more common and easily identified in the National Soil Survey Characterization Database (USDA-NRCS 1997) than are soils under a native condition, and therefore cultivated cropland provide a more robust sample for estimating the reference condition. Country-specific C stock change factors are derived from published literature to determine the impact of management practices on soil organic C storage (Ogle et al. 2003, Ogle et al. 2006). However, there are insufficient data to estimate a set of land use, management, and input factors for settlements. Moreover, the 2015 NRI survey data (USDA-NRCS 2018) do not provide the information needed to assign different land use subcategories to settlements, such as turf grass and impervious surfaces, which is needed to apply the Tier 1 factors from the IPCC guidelines (2006). Therefore, the United States has adopted a land use factor of 0.7 to represent a net loss of soil organic C with conversion to settlements under the assumption that there are additional soil organic C losses with land clearing, excavation and other activities associated with development. More specific factor values can be derived in future Inventories as data become available. See Annex 3.12 for additional discussion of the Tier 2 methodology for mineral soils.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. Soil organic C stock changes from 2016 to 2021 are estimated using a linear extrapolation method described in Box 6-4 of the Methodology section in Cropland Remaining Cropland. The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and is a standard data splicing method for imputing missing emissions data in a time series (IPCC 2006). The Tier 2 method described previously will be applied to recalculate the 2016 to 2021 emissions in a future Inventory.

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Land Converted to Settlements are estimated using the Tier 2 method provided in IPCC (2006). The Tier 2 method assumes that organic soils are losing C at a rate similar to croplands, and therefore uses the country-specific values for cropland (Ogle et al. 2003). To estimate CO₂ emissions from 1990 to 2015, the area of organic soils in Land Converted to Settlements is multiplied by the Tier 2 emission factor, which is 11.2 MT C per ha in cool temperate regions, 14.0 MT C per ha in warm temperate regions and 14.3 MT C per ha in subtropical regions (See Annex 3.12 for more information).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015, and a linear extrapolation method is used to approximate emissions for the remainder of the 2016 to 2021 time series (See Box 6-4 of the Methodology section in Cropland Remaining Cropland. The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and is a standard data splicing method for imputing missing emissions data in a time series (IPCC 2006). Estimates will be recalculated in future Inventories when new NRI data are incorporated into the inventory.

Uncertainty

The uncertainty analysis for C losses with Forest Land Converted to Settlements is conducted in the same way as the uncertainty assessment for forest ecosystem C flux in the Forest Land Remaining Forest Land category. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006), i.e., by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details, see the Uncertainty Analysis in Annex 3.13. The uncertainty analysis for mineral soil organic C stock changes and annual C emission estimates from drained organic soils in Land Converted to Settlements is estimated using a Monte Carlo approach, which is described in the Cropland Remaining Cropland section.

Uncertainty estimates are presented in Table 6-131 for each subsource (i.e., biomass C, dead wood, litter, soil organic C in mineral soils and organic soils) and the method applied in the inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates from the Tier 2 and 3 approaches are combined using the simple error propagation methods provided by the IPCC (2006), i.e., as described in the previous paragraph. There are also additional uncertainties propagated through the analysis associated with the data splicing methods applied to estimate soil organic C stock changes from 2016 to 2021. The combined uncertainty for total C stocks in Land Converted to Settlements ranges from 34 percent below to 34 percent above the 2021 stock change estimate of 81.0 MMT CO₂ Eq.

Table 6-131: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Settlements (MMT CO₂ Eq. and Percent)

	2021 Flux Estimate	Uncertainty Range Relative to Flux Estimate ^a						
Source	(MMT CO ₂ Eq.)	(MMT	CO₂ Eq.)	(%)				
		Lower	Upper	Lower	Upper			
		Bound	Bound	Bound	Bound			
Cropland Converted to Settlements	5.9	1.8	10.0	-69%	69%			
Mineral Soil C Stocks	5.1	1.1	9.2	-79%	79%			
Organic Soil C Stocks	0.8	0.1	1.5	-90%	90%			
Forest Land Converted to Settlements	63.7	38.4	89.0	-40%	40%			
Aboveground Biomass C Stocks	38.3	14.5	62.2	-62%	62%			

Mineral Soil C Stocks Organic Soil C Stocks	16.1 2.4	9.2 (6.3)	23.1 11.0	-43% -366%	43% 366%
Litter	9.7	3.6	15.4	-62%	62%
Dead Wood	6.6	2.4	10.4	-62%	62%
Belowground Biomass C Stocks	7.4	2.8	11.9	-62%	62%
Aboveground Biomass C Stocks	38.9	14.5	62.2	-62%	62%
Total: Land Converted to Settlements	81.0	53.4	108.6	-34%	34%
Organic Soil C Stocks	0.3	(0.3)	0.8	-191%	191%
Mineral Soil C Stocks	0.1	+	0.1	-110%	110%
Wetlands Converted to Settlements	0.3	(0.2)	0.9	-157%	157%
Organic Soil C Stocks	0.1	(0.1)	0.3	-175%	175%
Mineral Soil C Stocks	-1.3	(2.1)	(0.4)	-66%	66%
Other Lands Converted to Settlements	-1.2	(2.0)	(0.3)	-73%	73%
Organic Soil C Stocks	0.9	+	1.7	-95%	95%
Mineral Soil C Stocks	10.3	4.8	15.9	-54%	54%
Litter	0.2	0.1	0.3	-65%	56%
Dead Wood	0.2	0.1	0.3	-53%	65%
Belowground Biomass C Stocks	0.1	+	0.1	-49%	54%
Aboveground Biomass C Stocks	0.5	0.2	0.8	-65%	63%
Grassland Converted to Settlements	11.2	5.6	16.8	-50%	50%
Organic Soil C Stocks	0.3	0.1	0.5	-74%	74%
Mineral Soil C Stocks	1.9	1.2	2.5	-35%	35%
Litter	9.5	3.6	15.4	-62%	62%
Dead Wood	6.4	2.4	10.4	-62%	62%
Belowground Biomass C Stocks	7.3	2.8	11.9	-62%	62%

⁺ Does not exceed 0.05 MMT CO₂ Eq.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. No errors were found in this Inventory.

Recalculations Discussion

Recalculations are associated with new FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Settlements and woodland conversion associated with Grassland Converted to Settlements, and updated estimates for mineral and organic soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Settlements has an estimated larger C loss of 2.3 MMT CO₂ Eq. on average over the time series. This represents a 2.9 percent increase in C stock changes for Land Converted to Settlements compared to the previous Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) develop an inventory of mineral soil organic C stock changes in Alaska and losses of C from drained organic soils in federal lands. These improvements will resolve most of the differences between the managed land base for Land Converted to Settlements and amount of area currently included in Land Converted to Settlements Inventory (See Table 6-113).

^a Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval. Note: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

There are plans to improve classification of trees in settlements and to include transfer of biomass from forest land to those areas in this category. There are also plans to extend the Inventory to included C losses associated with drained organic soils in settlements occurring on federal lands.

These improvements will be made as funding and resources are available to expand the inventory for this source category.

Table 6-132: Area of Managed Land in Land Converted to Settlements that is not included in the current Inventory (Thousand Hectares)

	Area (1	Thousand Hectares	·)
		LCS Area	LCS Area Not
	LCS Managed Land	Included in	Included in
Year	Area (Section 6.1)	Inventory	Inventory
1990	2,865	2,861	5
1991	3,213	3,238	-25
1992	3,575	3,592	-17
1993	4,147	4,107	40
1994	4,712	4,630	82
1995	5,271	5,161	110
1996	5,844	5,658	186
1997	6,421	6,174	247
1998	6,938	6,650	288
1999	7,451	7,116	336
2000	7,981	7,568	413
2001	8,386	7,947	439
2002	8,722	8,284	437
2003	8,738	8,335	403
2004	8,755	8,345	410
2005	8,765	8,341	425
2006	8,740	8,352	387
2007	8,722	8,295	427
2008	8,546	8,111	434
2009	8,351	7,930	420
2010	8,157	7,725	432
2011	7,953	7,498	455
2012	7,744	7,298	446
2013	7,342	6,932	410
2014	6,952	6,586	366
2015	6,542	6,165	377
2016	6,122	*	*
2017	5,720	*	*
2018	5,201	*	*
2019	4,690	*	*
2020	4,188	*	*
2021	3,781	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

6.12 Other Land Remaining Other Land (CRF Category 4F1)

Land use is constantly occurring, and areas under a number of differing land-use types remain in their respective land-use type each year, just as other land can remain as other land. While the magnitude of Other Land Remaining Other Land is known (see Table 6-4), research is ongoing to track C pools in this land use. Until such time that reliable and comprehensive estimates of C for Other Land Remaining Other Land can be produced, it is not possible to estimate CO₂, CH₄ or N₂O fluxes on Other Land Remaining Other Land at this time.

6.13 Land Converted to Other Land (CRF Category 4F2)

Land-use change is constantly occurring, and areas under a number of differing land-use types are converted to other land each year, just as other land is converted to other uses. While the magnitude of these area changes is known (see Table 6-4), research is ongoing to track C across Other Land Remaining Other Land and Land Converted to Other Land. Until such time that reliable and comprehensive estimates of C across these land-use and land-use change categories can be produced, it is not possible to separate CO₂, CH₄ or N₂O fluxes on Land Converted to Other Land from fluxes on Other Land Remaining Other Land at this time.

Land Use, Land-Use Change, and Forestry 6-189

7. Waste

Waste management and treatment activities are sources of greenhouse gas emissions (see Figure 7-1 and Figure 7-2). Landfills accounted for approximately 16.9 percent of total U.S. anthropogenic methane (CH₄) emissions in 2021, the third largest source of CH₄ in the United States. Additionally, wastewater treatment and discharge, composting of organic waste, and anaerobic digestion at biogas facilities accounted for approximately 2.9 percent, 0.4 percent, and less than 0.1 percent of U.S. CH₄ emissions, respectively. Nitrous oxide (N₂O) emissions resulted from the discharge of wastewater treatment effluents into aquatic environments were estimated, the wastewater treatment process itself, and composting. Together, these waste activities account for 5.8 percent of total U.S. N₂O emissions. Nitrogen oxides (NO_x), carbon monoxide (CO), and non-CH₄ volatile organic compounds (NMVOCs) are emitted by waste activities and are addressed separately at the end of this chapter. A summary of greenhouse gas emissions from the Waste chapter is presented in Table 7-1 and Table 7-2. Overall, in 2021, waste activities generated emissions of 169.2 MMT CO₂ Eq., or 2.7 percent of total U.S. greenhouse gas emissions.

Emissions from landfills contributed 72.5 percent of waste sector emissions in 2021 and are primarily comprised of CH_4 emissions from municipal solid waste landfills (see Figure 7-1). Landfill emissions decreased by 2.2 MMT CO_2 Eq. (1.7 percent) since 2020. Emissions from wastewater treatment were the second largest source of wasterelated emissions in 2021, accounting for 24.8 percent of sector emissions. The remaining two sources of emissions, composting and anaerobic digestion at biogas facilities, account for 2.6 percent and 0.1 percent of waste sector emissions in 2021, respectively.



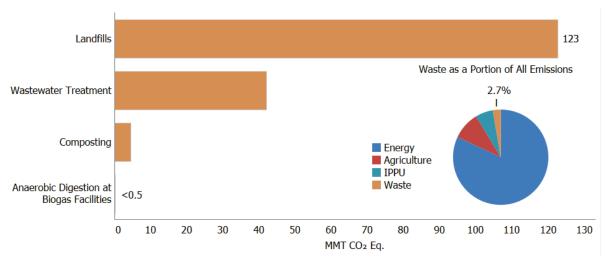


Figure 7-2: Trends in Waste Sector Greenhouse Gas Sources

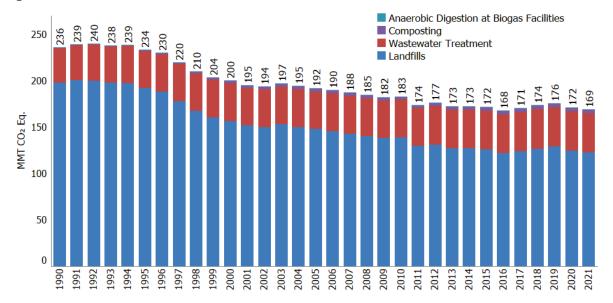


Table 7-1: Emissions from Waste (MMT CO₂ Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CH ₄	220.9	172.5	148.3	150.8	152.9	148.8	146.4
Landfills	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Wastewater Treatment	22.7	22.7	21.5	21.4	21.2	21.3	21.1
Composting	0.4	2.1	2.7	2.5	2.5	2.6	2.6
Anaerobic Digestion at Biogas							
Facilities	+	+	0.2	0.2	0.2	0.2	0.2
N ₂ O	15.1	19.5	22.6	22.9	23.1	22.7	22.7
Wastewater Treatment	14.8	18.1	20.6	21.2	21.3	20.9	20.9
Composting	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Total	236.0	192.1	170.9	173.7	176.0	171.5	169.2

⁺ Does not exceed 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Table 7-2: Emissions from Waste (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CH ₄	7,889	6,161	5,297	5,384	5,460	5,315	5,230
Landfills	7,063	5,275	4,424	4,525	4,607	4,456	4,379
Wastewater Treatment	811	809	770	763	755	761	753
Composting Anaerobic Digestion at Biogas	15	75	98	90	91	92	92
Facilities	1	2	6	6	6	6	6
N ₂ O	57	74	85	87	87	86	86
Wastewater Treatment	56	68	78	80	80	79	79
Composting	1	6	7	7	7	7	7

Note: Totals by gas may not sum due to independent rounding.

Carbon dioxide (CO_2), CH₄, and N₂O emissions from the incineration of waste are accounted for in the Energy sector rather than in the Waste sector because almost all incineration of municipal solid waste (MSW) in the United States occurs at waste-to-energy facilities where useful energy is recovered. Similarly, the Energy sector also includes an estimate of emissions from burning waste tires and hazardous industrial waste, because virtually all of the combustion occurs in industrial and utility boilers that recover energy. The incineration of waste in the United States in 2021 resulted in 12.8 MMT CO_2 Eq. emissions, more than half of which is attributable to the combustion of plastics. For more details on emissions from the incineration of waste, see Section 7.5. Greenhouse gas precursor emissions from the waste sector are presented in Section 7.6.

Each year, some emission and sink estimates in the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. For the current Inventory, minor improvements were implemented beyond routine activity data updates, including revising the industrial food waste disposal factor for estimating emissions from industrial landfills. In total, the methodological and historic data improvements made to the Waste sector in this Inventory resulted in an average increase in greenhouse gas emissions across the time series by 0.7 MMT CO₂ Eq. (0.4 percent). In addition, estimates of CO₂-equivalent emissions totals of CH₄ and N₂O have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous Inventories). For more information on specific methodological updates, please see the Recalculations Discussion for each category in this chapter. In total, the methodological and historic data improvements in addition to the change to AR5 GWP values, the Waste sector emissions increased 17.3 MMT CO₂ Eq. (9.6 percent) across the time series.

Due to lack of data availability, EPA is not able to estimate emissions associated with sludge generated from the treatment of industrial wastewater or the amount of CH₄ flared at composting sites. Emissions reported in the Waste chapter for landfills, wastewater treatment, and anaerobic digestion at biogas facilities include those from all 50 states, including Hawaii and Alaska, the District of Columbia, and U.S. Territories. Emissions from landfills include modern, managed sites in most U.S. Territories except for outlying Pacific Islands. Emissions from domestic wastewater treatment include most U.S. Territories except for outlying Pacific Islands. Those emissions are likely insignificant as those outlying Pacific Islands (e.g., Baker Island) have no permanent population. No industrial wastewater treatment emissions are estimated for U.S. Territories, due to lack of data availability. However, industrial wastewater treatment emissions are not expected for outlying Pacific Islands and assumed to be small for other U.S. Territories. Emissions for composting include Puerto Rico and all states except Alaska. Some composting operations in Alaska are known, but these consist of aerated composting facilities. Composting emissions are not included from the remaining U.S. Territories, and these are assumed to be small. Similarly, EPA is not aware of any anerobic digestion at biogas facilities in U.S. Territories but will review this on an ongoing basis to include these emissions if they are occurring. See Annex 5 for more information on EPA's assessment of the sources not included in this Inventory.

Box 7-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to Greenhouse Gas Reporting Data

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines) and its supplements and

Waste 7-3

¹ As specified in UNFCCC reporting guidelines, the GWPs used are those listed in table 8.A.1 in Annex 8.A of Chapter 8 of the *Fifth Assessment Report* of the Intergovernmental Panel on Climate Change, excluding the value for fossil methane.

refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and sinks provided in the Waste chapter do not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals from waste management and treatment activities.

EPA also collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP). The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject CO₂ underground for sequestration or other reasons and requires reporting by sources or suppliers in 41 industrial categories. Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases. In general, the threshold for reporting is 25,000 metric tons or more of CO₂ Eq. per year. See Annex 9 "Use of EPA Greenhouse Gas Reporting Program in Inventory" for more information.

Waste Data from EPA's Greenhouse Gas Reporting Program

EPA uses annual GHGRP facility-level data in the Landfills category to compile the national estimate of emissions from Municipal Solid Waste (MSW) landfills (see Section 7.1 of this chapter for more information). EPA uses directly reported GHGRP data for net CH₄ emissions from MSW landfills for the years 2010 to 2021 of the Inventory. MSW landfills subject to the GHGRP began collecting data in 2010. These data are also used to recalculate emissions from MSW landfills for the years 2005 to 2009 to ensure time-series consistency.

7.1 Landfills (CRF Source Category 5A1)

In the United States, solid waste is managed by landfilling, recovery through recycling or composting, and combustion through waste-to-energy facilities. Disposing of solid waste in modern, managed landfills is the most used waste management technique in the United States. More information on how solid waste data are collected and managed in the United States is provided in Box 7-3. The municipal solid waste (MSW) and industrial waste landfills referred to in this section are all modern landfills that must comply with a variety of regulations as discussed in Box 7-2. Disposing of waste in illegal dumping sites is not considered to have occurred in years later than 1980 and these sites are not considered to contribute to net emissions in this section for the timeframe of 1990 to the current Inventory year. MSW landfills, or sanitary landfills, are sites where MSW is managed to prevent or minimize health, safety, and environmental impacts. Waste is deposited in different cells and covered daily with soil; many have environmental monitoring systems to track performance, collect leachate, and collect landfill gas. Industrial waste landfills are constructed in a similar way as MSW landfills but are used to dispose of industrial solid waste, such as RCRA Subtitle D wastes (e.g., non-hazardous industrial solid waste defined in Title 40 of the Code of Federal Regulations [CFR] in section 257.2), commercial solid wastes, or conditionally exempt small-quantity generator wastes (EPA 2016a).

After being placed in a landfill, organic waste (such as paper, food scraps, and yard trimmings) is initially decomposed by aerobic bacteria. After the oxygen has been depleted, typically within less than one year, the remaining waste is available for consumption by anaerobic bacteria, which break down organic matter into substances such as cellulose, amino acids, and sugars. These substances are further broken down through fermentation into gases and short-chain organic compounds that form the substrates for the growth of methanogenic bacteria. These methane (CH₄) producing anaerobic bacteria convert the fermentation products

into stabilized organic materials and biogas consisting of approximately 50 percent biogenic carbon dioxide (CO₂) and 50 percent CH₄, by volume. Landfill biogas also contains trace amounts of non-methane organic compounds (NMOC) and volatile organic compounds (VOC) that either result from decomposition byproducts or volatilization of biodegradable wastes (EPA 2008).

Box 7-2: Description of a Modern, Managed Landfill in the United States

Modern, managed landfills are well-engineered facilities that are located, designed, operated, and monitored to ensure compliance with federal, state, and tribal regulations. A modern, managed landfill is EPA's interpretation of the IPCC's terminology of a managed solid waste disposal site. Municipal solid waste (MSW) landfills must be designed to protect the environment from contaminants which may be present in the solid waste stream. Additionally, many new landfills collect and destroy landfill gas through flares or landfill gas-to-energy projects. Requirements for affected MSW landfills may include:

- Siting requirements to protect sensitive areas (e.g., airports, floodplains, wetlands, fault areas, seismic impact zones, and unstable areas);
- Design requirements for new landfills to ensure that Maximum Contaminant Levels (MCLs) will not be
 exceeded in the uppermost aquifer (e.g., composite liners and leachate collection systems);
- Leachate collection and removal systems;
- Operating practices (e.g., daily and intermediate cover, receipt of regulated hazardous wastes, use of landfill cover material, access options to prevent illegal dumping, use of a collection system to prevent stormwater run-on/run-off, record-keeping);
- Air monitoring requirements (explosive gases);
- Groundwater monitoring requirements;
- Closure and post-closure care requirements (e.g., final cover construction); and
- Corrective action provisions.

Specific federal regulations that affected MSW landfills must comply with include the 40 CFR Part 258 (Subtitle D of RCRA), or equivalent state regulations and the NSPS 40 CFR Part 60 Subpart WWW and XXX.² Additionally, state and tribal requirements may exist.

Methane and CO_2 are the primary constituents of landfill gas generation and emissions. Net carbon dioxide flux from carbon stock changes of materials of biogenic origin in landfills are estimated and reported under the Land Use, Land-Use Change, and Forestry (LULUCF) sector (see Chapter 6 of this Inventory). Nitrous oxide (N_2O) emissions from the disposal and application of sewage sludge on landfills are also not explicitly modeled as part of greenhouse gas emissions from landfills. Nitrous oxide emissions from sewage sludge applied to landfills as a daily cover or for disposal are expected to be relatively small because the microbial environment in an anaerobic landfill is not very conducive to the nitrification and denitrification processes that result in N_2O emissions. Furthermore, the 2006 IPCC Guidelines did not include a methodology for estimating N_2O emissions from solid waste disposal sites "because they are not significant." Therefore, only CH_4 generation and emissions are estimated for landfills under the Waste sector.

Methane generation and emissions from landfills are a function of several factors, including: (1) the total amount and composition of waste-in-place, which is the total waste landfilled annually over the operational lifetime of a landfill; (2) the characteristics of the landfill receiving waste (e.g., size, climate, cover material); (3) the amount of CH₄ that is recovered and either flared or used for energy purposes; and (4) the amount of CH₄ oxidized as the landfill gas – that is not collected by a gas collection system – passes through the cover material into the

² For more information regarding federal MSW landfill regulations, see https://www.epa.gov/regulatory-information-topic/regulatory-and-guidance-information-topic-waste.

atmosphere. Each landfill has unique characteristics, but all managed landfills employ similar operating practices, including the application of a daily and intermediate cover material over the waste being disposed of in the landfill to prevent odor and reduce risks to public health. Based on recent literature, the specific type of cover material used can affect the rate of oxidation of landfill gas (RTI 2011). The most used cover materials are soil, clay, and sand. Some states also permit the use of green waste, tarps, waste derived materials, sewage sludge or biosolids, and contaminated soil as a daily cover. Methane production typically begins within the first year after the waste is disposed of in a landfill and will continue for 10 to 50 or more years as the degradable waste decomposes over time.

In 2021, landfill CH₄ emissions were approximately 122.6 MMT CO₂ Eq. (4,379 kt), representing the third largest source of CH₄ emissions in the United States, behind enteric fermentation and natural gas systems. Emissions from MSW landfills accounted for approximately 85 percent of total landfill emissions (103.7 MMT CO₂ Eq.), while industrial waste landfills accounted for the remainder (18.9 MMT CO₂ Eq.). Nationally, there are significantly less industrial waste landfills (hundreds) compared to MSW landfills (thousands), which contributes to the lower national estimate of CH₄ emissions for industrial waste landfills. Additionally, the average organic content of waste streams disposed in industrial waste landfills is lower than MSW landfills. Recent estimates of currently operational MSW landfills (those accepting waste) in the United States have ranged from 1,270 to 1,670 facilities (EPA 2022a; EPA 2022b; EPA 2019; Waste Business Journal [WBJ] 2020). The Environment Research & Education Foundation (EREF) conducted a nationwide analysis of MSW management and counted 1,540 operational MSW landfills in 2013 (EREF 2016). Conversely, there are approximately 3,200 MSW landfills in the United States that have been closed since 1980 (for which a closure data is known, (EPA 2022b; WBJ 2010). While the number of active MSW landfills has decreased significantly over the past 20 years, from approximately 6,326 in 1990 to as few as 1,540 in 2013, the average landfill size has increased (EPA 2022a; EREF 2016; BioCycle 2010). Larger landfills may have deeper cells where a greater amount of area will be anaerobic (more CH₄ is generated in anaerobic versus aerobic areas) and larger landfills tend to generate more CH₄ compared to a smaller landfill (assuming the same waste composition and age of waste). Regarding industrial waste landfills, the WBJ database includes approximately 1,200 landfills accepting industrial and/or construction and demolition debris for 2016 (WBJ 2016). Only 169 facilities with industrial waste landfills met the reporting threshold under Subpart TT (Industrial Waste Landfills) in the first year (2011) of EPA's Greenhouse Gas Reporting Program for this subpart (GHGRP codified in 40 CFR part 98), indicating that there may be several hundred industrial waste landfills that are not required to report under EPA's GHGRP. Less industrial waste landfills meet the GHGRP eligibility threshold because they typically accept waste streams with low to no organic content, which will not decompose and generate CH₄ when disposed.

The annual amount of MSW generated and subsequently disposed in MSW landfills varies annually and depends on several factors (e.g., the economy, consumer patterns, recycling and composting programs, inclusion in a garbage collection service). The estimated annual quantity of waste placed in MSW landfills increased 10 percent from approximately 205 MMT in 1990 to 226 MMT in 2000, then decreased by 11 percent to 202 MMT in 2010, and then increased by 7 percent to approximately 216 MMT in 2021 (see Annex 3.14, Table A-206). Emissions decreased between 1990 to 2021 largely because of increased use of landfill gas collection and control systems, closure of older landfills, better management practices, and increased diversion of organics through state and local policy and regulations. The total amount of MSW generated is expected to increase as the U.S. population continues to grow. The impacts of the coronavirus (COVID-19) pandemic with respect to landfilled waste cannot be quantified as data sources such as the EPA's *Advancing Sustainable Materials Management: Facts and Figures* report have not been published for 2019 through 2021. The quantities of waste landfilled for 2014 to 2021 (presented in Annex 3.14) are extrapolated based on population growth and the last national assessment of MSW landfilled from 2013 (EREF 2016). Net CH₄ emissions from MSW landfills have decreased since 1990 (see Table 7-3 and Table 7-4).

The estimated quantity of waste placed in industrial waste landfills (from the pulp and paper, and food processing sectors) has remained relatively steady since 1990, ranging from 9.7 MMT in 1990 to 11.2 MMT in 2021 (see Annex 3.14, Table A-206). CH_4 emissions from industrial waste landfills have also remained at similar levels recently, ranging from 16.1 MMT CO_2 Eq. in 2005 to 18.9 MMT CO_2 Eq. in 2021 when accounting for both CH_4 generation and oxidation. The EPA has focused the industrial waste landfills source category on industrial sectors known to

generate and dispose of by-products that are organic and contribute to CH₄ generation, which are the pulp and paper and food processing sectors. Construction and demolition (C&D) landfills, another type of industrial waste landfill, may accept waste that could degrade (e.g., treated wood), but these waste streams are unlikely to generate significant amounts of CH₄ and are therefore not as relevant to the purpose of national greenhouse gas emissions estimate. There is also a general lack of data on annual quantities of waste disposed in industrial waste landfills and the GHGRP Subpart TT (Industrial Waste Landfills) dataset has confirmed C&D landfills, for example, are insignificant CH₄ generators.

EPA's Landfill Methane Outreach Program (LMOP) collects information on landfill gas energy projects currently operational or under construction throughout the United States. LMOP's Landfill and Landfill Gas Energy Database contains certain information on the gas collection and control systems in place at landfills provided by organizations that are a part of the program, which can include the amount of landfill gas collected and flared. In 2021, LMOP identified 10 new landfill gas-to-energy (LFGE) projects (EPA 2022b) that began operation.

Landfill gas collection and control is not accounted for at industrial waste landfills in this chapter (see the Methodology discussion for more information).

Table 7-3:	CH ₄	Emissions	from	Landfills	(MMT	CO ₂ Eq.)
-------------------	-----------------	------------------	------	-----------	------	---------------------	---

Activity	1990	2005	2017	2018	2019	2020	2021
MSW CH ₄ Generation ^a	230.0	303.7	327.0	332.6	341.4	342.2	334.8
Industrial CH ₄ Generation	13.6	17.9	20.4	20.6	20.7	20.9	21.0
MSW CH ₄ Recovered ^a	(23.8)	(148.4)	(192.9)	(195.2)	(201.4)	(206.3)	(201.5)
MSW CH ₄ Oxidized ^a	(20.6)	(23.6)	(28.6)	(29.2)	(29.6)	(29.9)	(29.6)
Industrial CH ₄ Oxidized	(1.4)	(1.8)	(2.0)	(2.1)	(2.1)	(2.1)	(2.1)
MSW net CH ₄ Emissions	185.5	131.6	105.5	108.2	110.4	106.0	103.7
Industrial CH ₄ Emissions ^b	12.2	16.1	18.4	18.5	18.6	18.8	18.9
Total	197.8	147.7	123.9	126.7	129.0	124.8	122.6

^a For years 1990 to 2004, the Inventory methodology for MSW landfills uses the first order decay methodology. A methodological change occurs in year 2005. For years 2005 to 2021, directly reported net CH₄ emissions from the GHGRP data plus a scale-up factor are used to account for emissions from landfill facilities that are not subject to the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.14. These data incorporate CH₄ recovered and oxidized for MSW landfills. As such, CH₄ generation, CH₄ oxidation, and CH₄ recovery are not calculated separately and totaled to net CH₄ emissions. See the Methodology and Time-Series Consistency section of this chapter for more information.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values.

Table 7-4: CH₄ Emissions from Landfills (kt CH₄)

Activity	1990	2005	2017	2018	2019	2020	2021
MSW CH ₄ Generation ^a	8,214	10,845	11,680	11,878	12,193	12,222	11,958
Industrial CH ₄ Generation	484	638	729	734	739	745	750
MSW CH ₄ Recovered ^a	(851)	(5,301)	(6,891)	(6,970)	(7,193)	(7,367)	(7,195)
MSW CH ₄ Oxidized ^a	(736)	(843)	(1,021)	(1,044)	(1,058)	(1,069)	(1,059)
Industrial CH ₄ Oxidized	(48)	(64)	(73)	(73)	(74)	(75)	(75)
MSW net CH ₄ Emissions	6,627	4,701	3,768	3,864	3,942	3,786	3,704
Industrial net CH ₄ Emissions ^b	436	575	656	661	665	671	675
Total	7,063	5,275	4,424	4,525	4,607	4,456	4,379

^a For years 1990 to 2004, the Inventory methodology for MSW landfills uses the first order decay methodology. A methodological change occurs in year 2005. For years 2005 to 2021, directly reported net CH₄ emissions from the GHGRP data plus a scale-up factor are used to account for emissions from landfill facilities that are not subject to

^b Methane recovery is not calculated for industrial landfills because this is not a common practice in the United States. Only 1 landfill of 167 that report to Subpart TT (Industrial Waste Landfills) of the GHGRP had an active gas collection and control system during the year 2021 (EPA 2022a).

the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.14. These data incorporate CH₄ recovered and oxidized for MSW landfills. As such, CH₄ generation, CH₄ oxidation, and CH₄ recovery are not calculated separately and totaled to net CH₄ emissions. See the Methodology and Time-Series Consistency section of this chapter for more information.

^b Methane recovery is not calculated for industrial landfills because this is not a common practice in the United States. Only 1 landfill of 167 that report to Subpart TT (Industrial Waste Landfills) of the GHGRP had an active gas collection and control system during the year 2021 (EPA 2022a).

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values.

Methodology and Time-Series Consistency

Methodology Applied for MSW Landfills

A combination of IPCC Tier 2 and 3 approaches (IPCC 2006) are used over the reported timeseries to calculate emissions from MSW Landfills, using two primary methods. The first method uses the first order decay (FOD) model as described by the 2006 IPCC Guidelines to estimate CH₄ generation. The amount of CH₄ recovered and combusted from MSW landfills is subtracted from the CH₄ generation and is then adjusted with an oxidation factor. The oxidation factor represents the amount of CH₄ in a landfill that is oxidized to CO₂ as it passes through the landfill cover (e.g., soil, clay, geomembrane). This method is presented below and is similar to Equation HH-6 in 40 CFR Part 98.343 for MSW landfills, and Equation TT-6 in 40 CFR Part 98.463 for industrial waste landfills.

Equation 7-1: Landfill Methane Generation

$$CH_{4.MSW} = (G_{CH4} - \sum_{n=1}^{N} R_n) * (1 - OX)$$

where,

CH_{4,MSW} = Net CH₄ emissions from solid waste

G_{CH4,MSW} = CH₄ generation from MSW landfills, using emission factors for DOC, k, MCF, F from IPCC

(2006) and other peer-reviewed sources

R = CH₄ recovered and combusted

Ox = CH₄ oxidized from MSW landfills before release to the atmosphere, using Ox values from

IPCC (2006) and other peer-reviewed or scientifically validated literature (40 CFR Part 98)

The second method used to calculate CH_4 emissions from landfills, also called the back-calculation method, is based on directly measured amounts of recovered CH_4 from the landfill gas and is expressed below and by Equation HH-8 in 40 CFR Part 98.343. The two parts of the equation consider the portion of CH_4 in the landfill gas that is not collected by the landfill gas collection system, and the portion that is collected. First, the recovered CH_4 is adjusted with the collection efficiency of the gas collection and control system and the fraction of hours the recovery system operated in the calendar year. This quantity represents the amount of CH_4 in the landfill gas that is not captured by the collection system; this amount is then adjusted for oxidation. The second portion of the equation adjusts the portion of CH_4 in the collected landfill gas with the efficiency of the destruction device(s), and the fraction of hours the destruction device(s) operated during the year.

The current Inventory uses both methods to estimate CH₄ emissions across the time series within EPA's Waste Model, as summarized in Figure 7-3 below. This chapter provides a summary of the methods, activity data, and parameters used. Additional step-wise explanations to generate the net emissions are provided in Annex 3.14.

Equation 7-2: Net Methane Emissions from MSW Landfills

$$CH_{4,Solid Waste} = \left[\left(\frac{R}{CE \ x \ f_{BEC}} - R \right) x (1 - OX) + R \ x \left(1 - (DE \ x \ f_{Dest}) \right) \right]$$

where,

CH_{4,Solid} waste = Net CH₄ emissions from solid waste

R = Quantity of recovered CH₄ from Equation HH-4 of EPA's GHGRP

CE	=	Collection efficiency estimated at the landfill, considering system coverage, operation, and
		cover system materials from Table HH-3 of EPA's GHGRP. If area by soil cover type
		information is not available, the default value of 0.75 should be used (percent)
f_{REC}	=	fraction of hours the recovery system was operating (percent)
OX	=	oxidation factor (percent)

DE = destruction efficiency (percent)

f_{Dest} = fraction of hours the destruction device was operating (fraction)

Figure 7-3: Methodologies Used Across the Time Series to Compile the U.S. Inventory of Emission Estimates for MSW Landfills

	1990 - 2004	2005 - 2009	2010 - 2016	2017 - Present
Method	U.Sspecific first-order decay (FOD) model	Back-casted EPA GHGRP reported net methane emissions	EPA GHGRP reported net methane emissions	EPA GHGRP reported net methane emissions
	Annex Steps 1-3	Annex Step 4	Annex Step 5	Annex Step 6
Parameters	IPCC 2006 Emission Factors: DOC = 0.20 MCF = 1 DOC _f = 0.5 OX = 0.10 DE = 0.99 Activity Data: National waste generation data multiplied by the national disposal factor	 Back-casted GHGRP emissions plus a 9% scale-up factor ^{1, 2} Recovery calculated from four CH₄ recovery databases Back-calculated CH₄ generation ³ Weighted average oxidation factor based on GHGRP data ³ 	 Net GHGRP emissions plus a 9% scale-up factor ² GHGRP CH₄ recovery plus a 9% scale-up factor Back-calculated CH₄ generation ³ Weighted average oxidation factor based on GHGRP data ³ 	 Net GHGRP emissions plus an 11% scale-up factor ² GHGRP CH₄ recovery plus an 11% scale-up factor Back-calculated CH₄ generation ³ Weighted average oxidation factor based on GHGRP data ³

¹ The intent of the scale-up factor is to estimate emissions from landfills that do not report to the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.14. The back-casted emissions are calculated using directly reported net methane emissions for GHGRP reporting years 2010 to 2016. The back-casted emissions are subject to change in each Inventory based on new reporting year reports and resubmitted greenhouse gas reports for previous years. This method is compatible with the 2006 IPCC Guidelines because facilities reporting to the GHGRP either use the FOD method, or directly measured methane recovery data with default emission factors either directly included in the 2006 IPCC Guidelines or scientifically validated through peer review.

The Waste Model is a spreadsheet developed by the IPCC for purposes of estimating methane emissions from solid waste disposal sites, adapted to the United States by the inclusion and usage of U.S.-specific parameters. The Waste Model contains activity and waste generation information from both the MSW and Industrial landfill sectors and estimates the amount of CH₄ emissions from each sector for each year of the time series, using both methods. Prior to the 1990 through 2015 Inventory, only the FOD method was used. Methodological changes were made to the 1990 through 2015 Inventory to incorporate higher tier data (i.e., CH₄ emissions as directly reported to EPA's GHGRP), which cannot be directly applied to earlier years in the time series without significant bias. The technique used to merge the directly reported GHGRP data with the previous methodology is described as the overlap

² Emission factors used by facilities reporting to GHGRP Subpart HH are facility-specific defaults derived from peer-reviewed literature and the *2006 IPCC Guidelines*.

³ Methane generation is back-calculated from the net MSW emissions, estimated methane recovery data, and the weighted average oxidation factor based on GHGRP Subpart HH reported data of 0.18 between 2010 to 2015, and 0.21 between 2016 to 2019, and 0.22 in 2020 and 2021.

technique in the Time-Series Consistency chapter of the 2006 IPCC Guidelines. Additional details on the technique used is included in Annex 3.14, and a technical memorandum (RTI 2017).

A summary of the methodology used to generate the current 1990 to 2021 Inventory estimates for MSW landfills is as follows and is also illustrated in Annex Figure A-19:

- 1940 to 1989: These years are included for historical waste disposal amounts. Estimates of the annual quantity of waste landfilled for 1960 through 1988 were obtained from EPA's Anthropogenic Methane Emissions in the United States, Estimates for 1990: Report to Congress (EPA 1993) and an extensive landfill survey by the EPA's Office of Solid Waste in 1986 (EPA 1988). Although waste placed in landfills in the 1940s and 1950s contributes very little to current CH₄ generation, estimates for those years were included in the FOD model for completeness in accounting for CH₄ generation rates and are based on the population in those years and the per capita rate for land disposal for the 1960s. For the Inventory calculations, wastes landfilled prior to 1980 were broken into two groups: wastes disposed in managed, anaerobic landfills (Methane Conversion Factor, MCF, of 1) and those disposed in uncategorized solid waste disposal waste sites (MCF of 0.6) (IPCC 2006). Uncategorized sites represent those sites for which limited information is known about the management practices. All calculations after 1980 assume waste is disposed in managed, anaerobic landfills. The FOD method was applied to estimate annual CH₄ generation. Methane recovery amounts were then subtracted, and the result was then adjusted with a 10 percent oxidation factor to derive the net emissions estimates. A detailed explanation of the methods used are presented in Annex 3.14 Step 1.
- 1990 to 2004: The Inventory time series begins in 1990. The FOD method is exclusively used for this group of years. The national total of waste generated (based on state-specific landfill waste generation data) and a national average disposal factor for 1989 through 2004 were obtained from the State of Garbage (SOG) survey every two years (i.e., 2002, 2004 as published in BioCycle 2006). In-between years were interpolated based on population growth. For years 1989 to 2000, directly reported total MSW generation data were used; for other years, the estimated MSW generation (excluding construction and demolition waste and inerts) were presented in the reports and used in the Inventory. The FOD method was applied to estimate annual CH₄ generation. Landfill-specific CH₄ recovery amounts (calculated from four CH₄ recovery databases) were then subtracted from CH₄ generation and the result was adjusted with a 10 percent oxidation factor to derive the net emissions estimates. A detailed explanation of the methods used are presented in Annex 3.14 Steps 1 through 3.
- 2005 to 2009: Emissions for these years are estimated using net CH₄ emissions that are reported by landfill facilities under EPA's GHGRP. Because not all landfills in the United States are required to report to EPA's GHGRP, a 9 percent scale-up factor is applied to the GHGRP emissions for completeness. The intent of the scale-up factor is to account for emissions from landfills that do not report to the GHGRP. Supporting information, including details on the technique used to estimate emissions for 2005 to 2009, to develop the scale-up factor, and to ensure time-series consistency by incorporating the directly reported GHGRP emissions is presented in Annex 3.14 Step 4 and in RTI 2018a. Separate estimates of CH₄ generation, CH₄ recovery, and oxidation are calculated from the net CH₄ emissions. Landfill-specific CH₄ recovery is calculated from four CH₄ recovery databases. A single oxidation factor is not applied to the annual CH₄ generated as is done for 1990 to 2004 because the GHGRP emissions data are used, which already take oxidation into account. The GHGRP allows facilities to use varying oxidation factors (i.e., 0, 10, 25, or 35 percent) depending on their facility-specific calculated CH₄ flux rate. The effectively applied average oxidation factor between 2005 to 2009 averages to 0.14. Methane generation is then back-calculated using net CH₄ emissions, CH₄ recovery, and oxidation. A detailed explanation of the methods used to develop the back-casted emissions and revised scale-up factor are presented in Annex 3.14 Step 4.
- **2010 to 2016:** Net CH₄ emissions as directly reported to the GHGRP are used with a 9 percent scale-up factor to account for landfills that are not required to report to the GHGRP. A combination of the FOD method and the back-calculated CH₄ emissions were used by the facilities reporting to the GHGRP.

Landfills reporting to the GHGRP without gas collection and control apply the FOD method, while most landfills with landfill gas collection and control apply the back-calculation method. Methane recovery is calculated using reported GHGRP recovery data plus a 9 percent scale-up factor. Methane generation and oxidation are back-calculated from the net GHGRP CH₄ emissions applied and estimated CH₄ recovery. The average oxidation factor effectively applied is 0.18 percent. A detailed explanation of the methods used to develop the revised scale-up factor are presented in Annex 3.14 Step 5.

2017 to 2021: The same methodology is applied as for 2010 through 2016 where a scale-up factor is applied to account for landfills that are not required to report to the GHGRP. The scale-up factor was revised for the 1990 to 2020 Inventory to change the methodology from total waste-in-place to only considering waste disposed for non-reporting landfills in the past 50 years (i.e., since 1970). Additional revisions made included incorporating facilities that have stopped reporting to the GHGRP, new additions to the 2021 LMOP Database (EPA 2022b), corrections to the underlying database of non-reporting landfills used to develop the 9 percent scale-up factor that were identified. For 2017 to 2021, a scale-up factor of 11 percent is applied annually to the GHGRP net reported CH4 emissions. Methane recovery is calculated using reported GHGRP recovery data plus an 11 percent scale-up factor. Separate estimates of CH₄ generation and oxidation are calculated from the net CH₄ emissions applied. The average oxidation factor effectively applied is 0.22 percent. A detailed explanation of the methods used to develop the revised scale-up factor are presented in Annex 3.14 Step 6.

With regard to the time series and as stated in 2006 IPCC Guidelines Volume 1: Chapter 5 Time-Series Consistency (IPCC 2006), "the time series is a central component of the greenhouse gas inventory because it provides information on historical emissions trends and tracks the effects of strategies to reduce emissions at the national level. All emissions in a time series should be estimated consistently, which means that as far as possible, the time series should be calculated using the same method and data sources in all years" (IPCC 2006). In some cases, it may not be possible to use the same methods and consistent data sets for all years because of limited data (activity data, emission factors, or other parameters) directly used in the calculation of emission estimates for some historical years. In such cases, emissions or removals may need to be recalculated using alternative methods. In this case, this chapter provides guidance on techniques to splice, or join methodologies together instead of back-casting emissions back to 1990. One of those techniques is referred to as the overlap technique. The overlap technique is recommended when new data becomes available for multiple years. This was the case with EPA's GHGRP data for MSW landfills, where directly reported CH₄ emissions data became available for more than 1,200 MSW landfills beginning in 2010. The GHGRP emissions data had to be merged with emissions from the FOD method to avoid a drastic change in emissions in 2010, when the datasets were combined. EPA also had to consider that according to IPCC's good practice, efforts should be made to reduce uncertainty in Inventory calculations and that, when compared to the GHGRP data, the FOD method presents greater uncertainty.

In evaluating the best way to combine the two datasets, EPA considered either using the FOD method from 1990 to 2009, or using the FOD method for a portion of that time and back-casting the GHGRP emissions data to a year where emissions from the two methodologies aligned. Plotting the back-casted GHGRP emissions against the emissions estimates from the FOD method showed an alignment of the data in 2004 and later years which facilitated the use of the overlap technique while also reducing uncertainty. A detailed explanation and a chart showing the estimates across the time series considering the two method options is included in Annex 3.14. EPA ultimately decided to back-cast the GHGRP emissions from 2009 to 2005 only, to merge the datasets and adhere to the IPCC *Good Practice Guidance* for ensuring time-series consistency.

Supporting information, including details on the techniques used to ensure time-series consistency by incorporating the directly-reported GHGRP emissions is presented in Annex 3.14.

Methodology Applied for Industrial Waste Landfills

Emissions from industrial waste landfills are estimated using a Tier 2 approach (IPCC 2006) and a tailored (countryspecific) IPCC waste model. Activity data used are industrial production data (ERG 2021) for two sectors (pulp and

paper manufacturing, and food and beverage manufacturing) to which country-specific default waste disposal factors are applied (a separate disposal factor for each sector). The disposal factors, as described below, are based on scientifically reviewed data, and are the same across the entire time series. The emission factors are based on those recommended by the 2006 IPCC Guidelines and are the same across the entire time series.

The FOD equation from IPCC 2006 is used via the waste model to estimate methane emissions:

Equation 7-3: Net Methane Emissions from Industrial Waste Landfills

$$CH_{4,IND} = (G_{CH4} - \sum_{n=1}^{N} R_n) * (1 - OX)$$

where,

CH_{4,Solid Waste} = Net CH₄ emissions from solid waste

GCH4,Ind = CH4 generation from industrial waste landfills, using production data multiplied by a

disposal factor and emission factors for DOC, k, MCF, F (IPCC 2006)

R = CH₄ recovered and combusted (no recovery is assumed for industrial waste landfills)

OX = CH₄ oxidized from industrial waste landfills before release to the atmosphere (using the

2006 IPCC Guidelines value for OX of 0.10)

The activity data used in the emission calculations are production data (e.g., the amount of meat, poultry, vegetables processed; the amount of paper produced) versus disposal data. There are currently no facility-specific data sources that track and report the amount and type of waste disposed of in the universe of industrial waste landfills in the United States. EPA's GHGRP provides some insight into waste disposal in industrial waste landfills but is not comprehensive. Data reported to the GHGRP on industrial waste landfills suggests that most of the organic waste which would result in methane emissions is disposed at pulp and paper and food processing facilities. Of the 168 facilities that reported to Subpart TT of the GHGRP in 2019, 92 (54 percent) are in the North American Industrial Classification System (NAICS) for Pulp, Paper, and Wood Products (NAICS 321 and 322) and 12 (7 percent) are in Food Manufacturing (NAICS 311).

Based on this limited information, the Inventory methodology assumes most of the organic waste placed in industrial waste landfills originates from the food processing (meat, vegetables, fruits) and pulp and paper sectors, thus estimates of industrial landfill emissions focused on these two sectors. EPA validated this assumption through an analysis of the Subpart TT of the GHGRP in the 2016 reporting year (RTI 2018b). The Subpart TT waste disposal information for pulp and paper facilities correlates well with the activity data currently used to estimate Inventory emissions; however, the waste disposal information in Subpart TT related to food and beverage facilities are approximately an order of magnitude different than the Inventory disposal estimates for the entire time series.

EPA conducted a literature review between 2020 and 2022 to investigate other sources of industrial food waste and annual waste disposal quantities. As a result of this effort, EPA decided to revise the food waste disposal factor in the 1990 to 2021 Inventory for select years. A waste disposal factor of 4.86 percent is used for 1990 to 2009 and a revised factor of 6 percent is used for 2010 to the current year. The 6 percent waste disposal factor is derived from recent surveys of the food and beverage industry where approximately 94 percent of food waste generated is repurposed (FWRA 2016). The 4.86% disposal factor is based on available data from a 1993 Report to Congress (EPA 1993).

The composition of waste disposed of in industrial waste landfills is expected to be more consistent in terms of composition and quantity than that disposed of in MSW landfills. The amount of waste landfilled is assumed to be a fraction of production that is held constant over the time series as explained in Annex 3.14.

Landfill CH₄ recovery is not accounted for in industrial waste landfills and is believed to be minimal based on available data collected under EPA's GHGRP for industrial waste landfills (Subpart TT), which shows that only one of the 167 facilities, or 1 percent of facilities, have active gas collection systems (EPA 2022a). However, because EPA's GHGRP is not a national database and comprehensive data regarding gas collection systems have not been published for industrial waste landfills, assumptions regarding a percentage of landfill gas collection systems, or a

total annual amount of landfill gas collected for the non-reporting industrial waste landfills have not been made for the Inventory methodology.

The amount of CH₄ oxidized by the landfill cover at industrial waste landfills was assumed to be 10 percent of the CH₄ generated (IPCC 2006; Mancinelli and McKay 1985; Czepiel et al. 1996) for all years.

Box 7-3: Nationwide Municipal Solid Waste Data Sources

Municipal solid waste (MSW) generated in the United States can be managed through a variety of methods. MSW that is not recycled, composted, combusted with energy recovery, or digested is assumed to be landfilled. In addition to these management pathways, waste or excess food from the food manufacturing and processing sector may be disposed through the sewerage network, used for animal feed, land application, donated for human consumption, and rendered or recycled into biofuels in the case of animal by-products, fats, oils and greases.

There have been three main sources for nationwide solid waste management data in the United States that the Inventory has used (see Annex 3.14, Box A-3 for comparison of estimates from these data sources):

- The BioCycle and Earth Engineering Center of Columbia University's SOG in America surveys [no longer published];
- The EPA's Advancing Sustainable Materials Management: Facts and Figures reports; and
- The EREF's MSW Generation in the United States reports.

The SOG surveys and, most recently EREF, collected state-reported data on the amount of waste generated and the amount of waste managed via different management options: landfilling, recycling, composting, and combustion. These data sources used a 'bottom-up' method. The survey asked for actual tonnages instead of percentages in each waste category (e.g., residential, commercial, industrial, construction and demolition, organics, tires) for each waste management option. If such a breakdown was not available, the survey asked for total tons landfilled. The data were adjusted for imports and exports across state lines so that the principles of mass balance were adhered to for completeness, whereby the amount of waste managed did not exceed the amount of waste generated. The SOG and EREF reports present survey data aggregated to the state level.

The EPA Advancing Sustainable Materials Management: Facts and Figures report characterizes national postconsumer municipal solid waste (MSW) generation and management using a top-down materials flow (mass balance) methodology. It captures an annual snapshot of MSW generation and management in the United States for specific products. Data are gathered from U.S. Government (e.g., U.S. Census Bureau and U.S. Department of Commerce), state environmental agencies, industry and trade groups, and sampling studies. The materials flow methodology develops MSW waste generation estimates of quantities of MSW products in the marketplace (using product sales and replacement data) and assessing waste generation by component material based on product lifespans. The data are used to estimate tons of materials and products generated, recycled, combusted with energy recovery, managed via other food waste management pathways, or landfilled nationwide. MSW that is not recycled or composted is assumed to be combusted or landfilled, except for wasted food, which uses a different methodology and includes nine different management pathways. The 2018 Facts and Figures Report (EPA 2020) uses a methodology that expanded the number of management pathways to include: animal feed; bio-based materials/biochemical processing (i.e., rendering); co-digestion/anaerobic digestion; composting/aerobic processes; combustion; donation; land application; landfill; and sewer/wastewater treatment.

In this Inventory, emissions from solid waste management are presented separately by waste management option, except for recycling of waste materials. Emissions from recycling are attributed to the stationary combustion of fossil fuels that may be used to power on-site recycling machinery and are presented in the stationary combustion chapter in the Energy sector, although the emissions estimates are not called out separately. Emissions from solid waste disposal in landfills and the composting of solid waste materials are presented in the Landfills and Composting sections in the Waste sector of this report. Emissions from anaerobic digesters are presented in three different sections depending on the digester category. Emissions from on-farm digesters are included in the Agriculture sector; emissions from digesters at wastewater treatment plants and emissions from stand-alone digesters are presented in separate sections in the Waste sector of this report. In the United States, almost all incineration of MSW occurs at waste-to-energy (WTE) facilities or industrial facilities where useful energy is recovered, and thus emissions from waste incineration are accounted for in the Incineration chapter of the Energy sector of this report.

Uncertainty

Several types of uncertainty are associated with the estimates of CH_4 emissions from MSW and industrial waste landfills when the FOD method is applied directly for 1990 to 2004 in the Waste Model and, to some extent, in the GHGRP methodology. The approach used in the MSW emission estimates assumes that the CH_4 generation potential (L_0) and the rate of decay that produces CH_4 from MSW, as determined from several studies of CH_4 recovery at MSW landfills, are representative of conditions at U.S. MSW landfills. When this top-down approach is applied at the nationwide level, the uncertainties are assumed to be less than when applying this approach to individual landfills and then aggregating the results to the national level. In other words, the FOD method as applied in this Inventory is not facility-specific modeling and while this approach may over- or underestimate CH_4 generation at some landfills if used at the facility-level, the result is expected to balance out because it is being applied nationwide.

There is a high degree of uncertainty associated with the FOD model, particularly when a homogeneous waste composition and hypothetical decomposition rates are applied to heterogeneous landfills (IPCC 2006). There is less uncertainty in EPA's GHGRP data because this methodology is facility-specific, uses directly measured CH₄ recovery data (when applicable), and allows for a variety of landfill gas collection efficiencies, destruction efficiencies, and/or oxidation factors to be used.

Uncertainty also exists in the scale-up factors (both 9 percent and 11 percent) applied for years 2005 to 2016 and 2017 to 2021, respectively, and in the back-casted emissions estimates for 2005 to 2009. As detailed in RTI (2018a), limited information is available for landfills that do not report to the GHGRP. RTI developed an initial list of landfills that do not report to the GHGRP with the intent of quantifying the total waste-in-place for these landfills that would add up to the scale-up factor. Input was provided by industry, LMOP, and additional EPA support. However, many gaps existed in the initial development of this Non-Reporting Landfills Database. Assumptions were made for hundreds of landfills to estimate their waste-in-place and the subsequent scale-up factors. The waste-in-place estimated for each landfill is likely not 100 percent accurate and should be considered a reasonable estimate. Additionally, a simple methodology was used to back-cast emissions for 2005 to 2009 using the GHGRP-reported emissions from 2010 to 2021. This methodology does not factor in annual landfill to landfill changes in landfill CH₄ generation and recovery. Because of this, an uncertainty factor of 25 percent is applied to the scale-up factor and years (emission estimates) the scale-up factor is applied to.

Aside from the uncertainty in estimating landfill CH₄ generation, uncertainty also exists in the estimates of the landfill gas oxidized at MSW landfills. Facilities directly reporting to EPA's GHGRP can use oxidation factors ranging from 0 to 35 percent, depending on their facility-specific CH₄ flux. As recommended by the 2006 IPCC Guidelines for managed landfills, a 10 percent default oxidation factor is applied in the Inventory for both MSW landfills (those not reporting to the GHGRP and for the years 1990 to 2004 when GHGRP data are not available) and industrial waste landfills regardless of climate, the type of cover material, and/or presence of a gas collection system.

Another significant source of uncertainty lies with the estimates of CH₄ recovered by flaring and gas-to-energy projects at MSW landfills that are sourced from the Inventory's CH₄ recovery databases (used for years 1990 to 2004). Four CH₄ recovery databases are used to estimate nationwide CH₄ recovery for MSW landfills for 1990 to 2009. The GHGRP MSW landfills database was added as a fourth recovery database starting with the 1990 to 2013

Inventory report (two years before the full GHGRP data set started being used for net CH₄ emissions for the Inventory). Relying on multiple databases for a complete picture introduces uncertainty because the coverage and characteristics of each database differs, which increases the chance of double counting avoided emissions. The methodology and assumptions that go into each database differ. For example, the flare database assumes the midpoint of each flare capacity at the time it is sold and installed at a landfill; the flare may be achieving a higher capacity, in which case the flare database would underestimate the amount of CH₄ recovered. Additionally, two databases, the EIA database and flare vendor database, could no longer be updated for the entire time series due to external factors. For example, the EIA database has not been updated since 2006 because the EIA stopped collected landfill recovery data. The EIA database has, for the most part, been replaced by the GHGRP MSW landfills database. The flare database was populated annually until 2015, but decreasing, voluntary participation from flare vendors sharing their flare sales data for several years prior to 2015.

To avoid double counting and to use the most relevant estimate of CH₄ recovery for a given landfill, a hierarchical approach is used among the four databases. GHGRP data and the EIA data are given precedence because facility data were directly reported; the LFGE data are given second priority because CH₄ recovery is estimated from facility-reported LFGE system characteristics; and the flare data are given the lowest priority because this database contains minimal information about the flare, no site-specific operating characteristics, and includes smaller landfills not included in the other three databases (Bronstein et al. 2012). The coverage provided across the databases most likely represents the complete universe of landfill CH₄ gas recovery; however, the number of unique landfills between the four databases does differ.

The 2006 IPCC Guidelines default value of 10 percent for uncertainty in recovery estimates was used for two of the four recovery databases in the uncertainty analysis where metering of landfill gas was in place (for about 64 percent of the CH₄ estimated to be recovered). This 10 percent uncertainty factor applies to the LFGE database; 12 percent to the EIA database; and 1 percent for the GHGRP MSW landfills dataset because of the supporting information provided and rigorous verification process. For flaring without metered recovery data (the flare database), a much higher uncertainty value of 50 percent is used. The compounding uncertainties associated with the four databases in addition to the uncertainties associated with the FOD method and annual waste disposal quantities leads to the large upper and lower bounds for MSW landfills presented in Table 7-5.

The lack of landfill-specific information regarding the number and type of industrial waste landfills in the United States is a primary source of uncertainty with respect to the industrial waste generation and emission estimates. The approach used here assumes that most of the organic waste disposed of in industrial waste landfills that would result in CH₄ emissions consists of waste from the pulp and paper and food processing sectors. However, because waste generation and disposal data are not available in an existing data source for all U.S. industrial waste landfills, a straight disposal factor is applied over the entire time series to the amount produced to determine the amounts disposed. Industrial waste facilities reporting under EPA's GHGRP do report detailed waste stream information, and these data have been used to improve, for example, the DOC value used in the Inventory methodology for the pulp and paper sector. A 10 percent oxidation factor is also applied to CH₄ generation estimates for industrial waste landfills and carries the same amount of uncertainty as with the factor applied to CH₄ generation for MSW landfills.

The results of the 2006 IPCC Guidelines Approach 2 quantitative uncertainty analysis are summarized in Table 7-5. There is considerable uncertainty for the MSW landfills estimates due to the many data sources used, each with its own uncertainty factor.

Table 7-5: Approach 2 Quantitative Uncertainty Estimates for CH₄ Emissions from Landfills (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncerta	inty Range Relat	ive to Emission Es	stimatea
Jource	- Gus	(MMT CO ₂ Eq.)		CO ₂ Eq.)		%)
			Lower	Upper	Lower	Upper
			Bound	Bound	Bound	Bound
Total Landfills	CH ₄	122.6	98.9	154.4	-19%	26%

MSW	CH ₄	103.7	83.2	137.5	-20%	33%
Industrial	CH ₄	18.9	15.9	25.8	-16%	36%

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval. Individual uncertainty factors are applied to activity data and emission factors in the Monte Carlo analysis.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the *U.S. Inventory* QA/QC plan, which is in accordance with Vol. 1, Chapter 6 of *2006 IPCC Guidelines* (see Annex 8 for more details). QA/QC checks are performed for the transcription of the published data set (e.g., EPA's GHGRP dataset) used to populate the Inventory data set in terms of completeness and accuracy against the reference source. Additionally, all datasets used for this category have been checked to ensure they are of appropriate quality and are representative of U.S. conditions. The primary calculation spreadsheet is tailored from the *2006 IPCC Guidelines* waste model and has been verified previously using the original, peer-reviewed IPCC waste model. All model input values and calculations were verified by secondary QA/QC review. Stakeholder engagements sessions in 2016 and 2017 were used to gather input on methodological improvements and facilitate an external expert review on the methodology, activity data, and emission factors.

Category-specific checks include the following:

- Evaluation of the secondary data sources used as inputs to the Inventory dataset to ensure they are appropriately collected and are reliable;
- Cross-checking the data (activity data and emissions estimates) with previous years to ensure the data are reasonable, and that any significant variation can be explained through the activity data;
- Conducting literature reviews to evaluate the appropriateness of country-specific emission factors (e.g., DOC values, precipitation zones with respect to the application of the k values) given findings from recent peer-reviewed studies; and
- Reviewing secondary datasets to ensure they are nationally complete and supplementing where
 necessary (e.g., using a scale-up factor to account for emissions from landfills that do not report to EPA's
 GHGRP).

A primary focus of the QA/QC checks in past Inventories was to ensure that CH₄ recovery estimates were not double-counted and that all LFGE projects and flares were included in the respective project databases. QA/QC checks performed in the past for the recovery databases were not performed in this Inventory, because new data were not added to the recovery databases in this Inventory year.

For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., combination of electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent.³ Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with several general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. For the MSW Landfills sector, under Subpart HH of the GHGRP, MSW Landfills with gas collection are required to report emissions from their site using both a forward- (using a first order decay model as a basis) and back-calculating (using parameters specific to the landfill itself, such as measured recovery and collection efficiency of the landfill gas) methodology. Details on the forward- and back-calculation approach can be found in Annex 3.14 and 40 CFR Subpart HH of Part 98. Reporters can choose which of these two methodologies they believe best represents the emissions at their landfill and are required to submit that value as their total Subpart HH emissions. Facilities are generally not expected to switch between the two

7-16 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2021

³ See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

equations each year, as the emissions calculated using each method can vary greatly and can have a significant effect on emission trends for that landfill, and potentially the entire MSW Landfill sector under the GHGRP. Key checks are in place to assure that emissions are trending in a sensible way year over year for each reporting landfill.

Recalculations Discussion

Revisions to the individual facility reports submitted to EPA's GHGRP can be made at any time and a portion of facilities have revised their reports since 2010 for various reasons, resulting in changes to the total net CH₄ emissions for MSW landfills. Each Inventory year, the back-casted emissions for 2005 to 2009 will be recalculated using the most recently verified data from the GHGRP. Changes in these data result in changes to the back-casted emissions. The impact of the revisions to the GHGRP Subpart HH annual greenhouse gas reports resubmitted for 2010 to 2021 slightly increased or decreased total Subpart HH reported net emissions up to 0.5 percent in the years the Subpart HH data are applied (i.e., 2005 to 2020). The resubmissions resulted in annual increases ranging from 0.1 percent to 0.3 percent to the net MSW emissions between 2005 to 2009, no net emission changes for 2010 to 2015, and a slight decrease averaging -0.15 percent of emissions is observed between 2016 to 2019. A 0.5 percent increase is observed for 2020. Between 2005 to 2020, on average, the impact or change was very small (less than 0.1% percent) in emissions across all reporters. A change in net Subpart HH reported emissions results in the same percentage change in the Inventory emissions for that year.

The revision to the industrial food waste disposal factor from 4.86 percent to 6 percent increased net industrial emissions between 2010 to 2020 from a low of 2.1 percent in 2011 to a high of 10.9 percent in 2020. Combined, these two recalculations increased net landfill emissions for all years between 2005 to 2020. Emissions increased by less than 1 percent between 2005 to 2014 (low of 0.3 percent in 2005 and a high of 0.8 percent in 2014) and up to 1.9 percent between 2015 to 2020 (low of 1.0 percent in 2015 to a high of 1.9 percent in 2020).

In addition, for the current Inventory, estimates of CO2 equivalent emissions totals of CH4 emissions from landfills have been revised to apply the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous inventories). The GWP of CH4 has increased from 25 to 28, leading to an overall increase in CO₂-equivalent CH₄ emissions. The AR5 GWPs have been applied across the entire time series for consistency. Compared to the previous Inventory which applied 100-year GWP values from AR4, the change in CH₄ emissions was a 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA received recommendations from industry stakeholders regarding the DOC values and decay rates (k values) required to be used in the GHGRP calculations. Stakeholders have suggested that newer, more up-to-date default values considering recent trends in the composition of waste disposed in MSW landfills for both k and DOC in the GHGRP should be developed and reflected in the 2005 and later years of the Inventory. In response, EPA developed a multivariate analysis using publicly available Subpart HH GHGRP data, solving for optimized DOC and k values across the more than 1,100 landfills reporting to the program. The results of this analysis could help inform a current GHGRP rulemaking (87 FR 36920) where changes could be made to the default DOC and k values contained within Subpart HH, which could then be carried over to the Inventory emissions estimates for MSW landfills upon promulgation of any revisions to 40 CFR part 98. This potential improvement may be long-term.

With respect to the scale-up factor, EPA received comments on revisions made to the scale-up for the 1990 to 2020 inventory from a total waste-in-place approach to a time-based threshold of 50 years. Commenters noted that this time-based threshold approach does not adjust for the non-linearity of methane production of landfill gas. In response, EPA will further investigate how best to account for emissions from MSW landfills that do not

report to the GHGRP, including using the FOD model for these landfills based on estimated annual waste disposed for this subset of landfills between 2005 to 2021, reverting to the total waste-in-place approach, or modifying the time-based threshold approach. Any methodological revisions to accounting for emissions from this subset of landfills will be made in the future (1990 to 2022) Inventory.

Relatedly, EPA will periodically assess the impact to the waste-in-place and emissions data from GHGRP facilities that have resubmitted annual reports during any reporting years, are new reporting facilities, and from facilities that have stopped reporting to the GHGRP to ensure national estimates are as complete as possible. Facilities may stop reporting to the GHGRP when they meet the "off-ramp" provisions (reported less than 15,000 metric tons of CO₂ equivalent emissions for 3 consecutive years or less than 25,000 metric tons of CO₂ equivalent emissions for 5 consecutive years). If warranted, EPA will revise the scale-up factor to reflect newly acquired information to ensure completeness of the Inventory. EPA considered public comments received on the 1990-2019 Inventory specific to using a time-based threshold to calculate the scale-up factor instead of a total waste-in-place approach. The rationale supporting the comments was that older, closed landfills with large quantities of waste-in-place are driving up the scale-up factor but have little impact on total methane generation. EPA assessed two time-based scenarios for developing the scale-up factor — one scenario looking at the past 30 years of waste disposed, and the second looking at the past 50 years of waste disposed. The 50-year time-based threshold was applied and resulted in the 11 percent scale-up factor used between 2017 and 2021.

EPA is planning to account for unmanaged landfills in Puerto Rico and other U.S. Territories to the landfill emissions estimates. Data limitations for historical waste received at these sites make this challenging. Presently, emissions from managed sites in Puerto Rico and Guam are accounted for in 2005 to present as part of the GHGRP Subpart HH dataset.

Additionally, with the recent publication of the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2019), EPA will begin to update applicable emission factors, methodologies, and assumptions underlying emission estimates for landfills and make any applicable changes during the next (1990 to 2022) Inventory cycle per the 2019 Refinement.

Box 7-4: Overview of U.S. Solid Waste Management Trends

As shown in Figure 7-4 and Figure 7-5 landfilling of MSW is currently and has been the most common waste management practice. A large portion of materials in the waste stream are recovered for recycling and composting, which is becoming an increasingly prevalent trend throughout the country. Materials that are composted and recycled would have previously been disposed in a landfill.

Other Food Management

Composted

9%

MSW to WTE

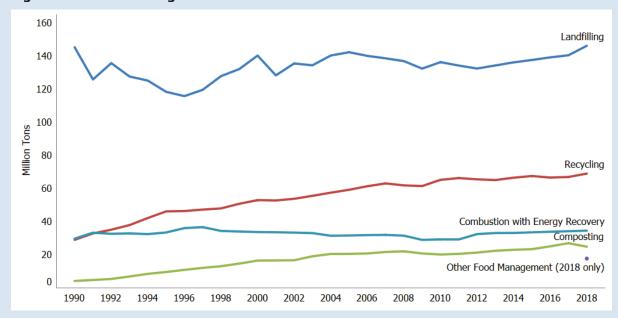
12%

Recycled
24%

Note: 2018 is the latest year of available data. Data taken from Table 35 of EPA (2020a). MSW to WTE is combustion with energy recovery (WTE = waste-to-energy).

Source: EPA (2020b)

Figure 7-5: MSW Management Trends from 1990 to 2018



Note: 2018 is the latest year of available data. Only one year of data (2018) is available for the "Other Food Management" category.

Source: EPA (2020b). The EPA Advancing Sustainable Materials Management reports only present data for select years, thus several reports were used in the compilation of this figure. All data were taken from Table 35 in EPA 2020b for 1990, 2000, 2015, 2017 and 2018. Data were taken from Table 35 in EPA (2019) for 2010 and 2016. Data were taken from EPA (2018) for 2014. Data were taken from Table 35 of EPA (2016b) for 2012 and 2013. Data were taken from Table 30 of EPA

(2014) for 2008 and 2011. The reports with data available for years prior to EPA (2012) can be provided upon request but are no longer on the EPA's Advancing Sustainable Materials Management web site.⁴

Table 7-6 presents the national-level material composition of waste disposed across typical MSW landfills in the United States over time. It is important to note that the actual composition of waste entering each landfill will vary from that presented in Table 7-6.

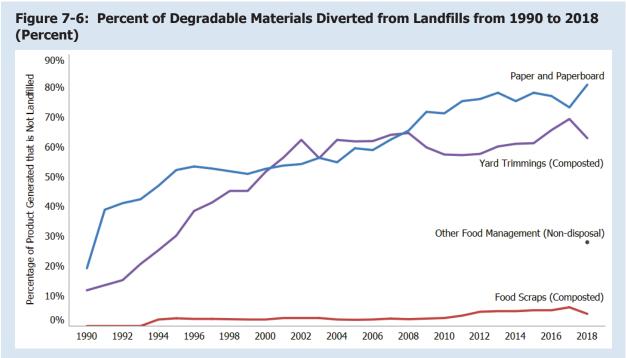
Understanding how the waste composition changes over time, specifically for the degradable waste types (i.e., those types known to generate CH₄ as they break down in a modern MSW landfill), is important for estimating greenhouse gas emissions. Increased diversion of degradable materials so that they are not disposed of in landfills reduces the CH₄ generation potential and CH₄ emissions from landfills. For certain degradable waste types (i.e., paper and paperboard), the amounts discarded have decreased over time due to an increase in waste diversion through recycling and composting (see Table 7-6 and Figure 7-6). As shown in Figure 7-6, the diversion of food scraps has been consistently low since 1990 because most cities and counties do not practice curbside collection of these materials, although the quantity has been slowly increasing in recent years. Neither Table 7-6 nor Figure 7-6 reflect the frequency of backyard composting of yard trimmings and food waste because this information is largely not collected nationwide and is hard to estimate.

Table 7-6: Materials Discarded in the Municipal Waste Stream by Waste Type from 1990 to 2018 (Percent)

Waste Type	1990	2005	2015	2016	2017	2018
Paper and Paperboard	30.0%	24.7%	13.3%	12.7%	13.1%	11.8%
Glass	6.0%	5.8%	5.0%	4.9%	4.9%	5.2%
Metals	7.2%	7.9%	9.5%	9.8%	9.9%	9.5%
Plastics	9.5%	16.4%	18.9%	18.9%	19.2%	18.5%
Rubber and Leather	3.2%	2.9%	3.3%	3.4%	3.5%	3.4%
Textiles	2.9%	5.3%	7.7%	8.0%	8.0%	7.7%
Wood	6.9%	7.5%	8.0%	8.8%	8.7%	8.3%
Other	1.4%	1.8%	2.2%	2.2%	2.2%	2.0%
Food Scraps	13.6%	18.5%	22.0%	22.1%	22.0%	24.1%
Yard Trimmings	17.6%	7.0%	7.8%	6.9%	6.2%	7.2%
Miscellaneous Inorganic Wastes	1.7%	2.2%	2.3%	2.3%	2.3%	2.3%

Source: EPA (2020b)

⁴ See https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/advancing-sustainable-materials-management.



Note: The data shown in this chart are for recycling of paper and paperboard, composting of food scraps and yard trimmings, and alternative management pathways for the Other Food Management (non-disposal) category. The Other Food Management (non-disposal) category is a new addition and only one year of data are available for 2018 (28 percent of the food waste generated was beneficially reused or managed using a method that was not landfilling, recycling, or composting). The Other Food Management pathways include animal feed, bio-based materials/biochemical processing, co-digestion/anaerobic digestion, donation, land application, and sewer/wastewater treatment.

Source: EPA (2020b). The EPA Advancing Sustainable Materials reports only present data for select years, thus several reports were used in the compilation of this figure. All data were taken from Table 35 in EPA (2020b) for 1990, 2000, 2015, 2017 and 2018. Data were taken from Table 35 in EPA (2019) for 2010 and 2016. Data were taken from EPA (2018) for 2014. Data were taken from Table 35 of EPA (2016b) for 2012 and 2013. Data were taken from Table 30 of EPA (2014) for 2008 and 2011. The reports with data available for years prior to EPA (2012) can be provided upon request, but are not longer on the EPA's Advancing Sustainable Materials Management website. ⁵

Waste 7-21

⁵ See https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/advancing-sustainable-materials-management.

7.2 Wastewater Treatment and Discharge (CRF Source Category 5D)

Wastewater treatment and discharge processes are sources of anthropogenic methane (CH₄) and nitrous oxide (N_2O) emissions. Wastewater from domestic and industrial sources is treated to remove soluble organic matter, suspended solids, nutrients, pathogenic organisms, and chemical contaminants. Treatment of domestic wastewater may either occur on site, most commonly through septic systems, or off site at centralized treatment systems, most commonly at publicly owned treatment works (POTWs). In the United States, approximately 17 percent of domestic wastewater is treated in septic systems or other on-site systems, while the rest is collected and treated centrally (U.S. Census Bureau 2019). Treatment of industrial wastewater may occur at the industrial plant using package or specially designed treatment plants or be collected and transferred off site for co-treatment with domestic wastewater in centralized treatment systems.

Centralized Treatment. Centralized wastewater treatment systems use sewer systems to collect and transport wastewater to the treatment plant. Sewer collection systems provide an environment conducive to the formation of CH₄, which can be substantial depending on the configuration and operation of the collection system (Guisasola et al. 2008). Recent research has shown that at least a portion of CH₄ formed within the collection system enters the centralized system where it contributes to CH₄ emissions from the treatment system (Foley et al. 2015).

The treatment plant may include a variety of processes, ranging from physical separation of material that readily settles out (typically referred to as primary treatment), to treatment operations that use biological processes to convert and remove contaminants (typically referred to as secondary treatment), to advanced treatment for removal of targeted pollutants, such as nutrients (typically referred to as tertiary treatment). Not all wastewater treatment plants conduct primary treatment prior to secondary treatment, and not all plants conduct advanced or tertiary treatment (EPA 1998a).

Soluble organic matter is generally removed using biological processes in which microorganisms consume the organic matter for maintenance and growth. Microorganisms can biodegrade soluble organic material in wastewater under aerobic or anaerobic conditions, where the latter condition produces CH4. The resulting biomass (sludge) is removed from the effluent prior to discharge to the receiving stream and may be further biodegraded under aerobic or anaerobic conditions, such as anaerobic sludge digestion. Sludge can be produced from both primary and secondary treatment operations. Some wastewater may also be treated using constructed (or seminatural) wetland systems, though this is much less common in the United States and represents a relatively small portion of wastewater treated centrally (<0.1 percent) (ERG 2016). Constructed wetlands are a coupled anaerobic-aerobic system and may be used as the primary method of wastewater treatment, or are more commonly used as a final treatment step following settling and biological treatment. Constructed wetlands develop natural processes that involve vegetation, soil, and associated microbial assemblages to trap and treat incoming contaminants (IPCC 2014). Constructed wetlands do not produce secondary sludge (sewage sludge).

The generation of N_2O may also result from the treatment of wastewater during both nitrification and denitrification of the nitrogen (N) present, usually in the form of urea, proteins, and ammonia. Ammonia N is converted to nitrate (NO_3) through the aerobic process of nitrification. Denitrification occurs under anoxic/anaerobic conditions, whereby anaerobic or facultative organisms reduce oxidized forms of nitrogen (e.g., nitrite, nitrate) in the absence of free oxygen to produce nitrogen gas (N_2). Nitrous oxide is generated as a byproduct of nitrification, or as an intermediate product of denitrification. No matter where N_2O is formed it is

-

⁶ Throughout the Inventory, emissions from domestic wastewater also include any commercial and industrial wastewater collected and co-treated with domestic wastewater.

typically stripped (i.e., transferred from the liquid stream to the air) in aerated parts of the treatment process. Stripping also occurs in non-aerated zones at rates lower than in aerated zones.

On-site Treatment. The vast majority of on-site systems in the United States are septic systems composed of a septic tank, generally buried in the ground, and a soil dispersion system. Solids and dense materials contained in the incoming wastewater (influent) settle in the septic tank as sludge. Floatable material (scum) is also retained in the tank. The sludge that settles on the bottom of the tank undergoes anaerobic digestion. Partially treated water is discharged in the soil dispersal system. The solid fraction accumulates and remains in the tank for several years, during which time it degrades anaerobically. The gas produced from anaerobic sludge digestion (mainly CH4 and biogenic CO₂) rises to the liquid surface and is typically released through vents. The gas produced in the effluent dispersal system (mainly N2O and biogenic CO2) is released through the soil.

Discharge. Dissolved CH₄ and N₂O that is present in wastewater discharges to aquatic environments has the potential to be released (Short et al. 2014; Short et al. 2017), and the presence of organic matter or nitrogen in wastewater discharges is generally expected to increase CH₄ and N₂O emissions from these aquatic environments. Where organic matter is released to slow-moving aquatic systems, such as lakes, estuaries, and reservoirs, CH₄ emissions are expected to be higher. Similarly, in the case of discharge to nutrient-impacted or hypoxic waters, N₂O emissions can be significantly higher.

In summary, the principal factor in determining the CH₄ generation potential of wastewater is the amount of degradable organic material in the wastewater. Common parameters used to measure the organic component of the wastewater are the biochemical oxygen demand (BOD) and chemical oxygen demand (COD). Under the same conditions, wastewater with higher COD (or BOD) concentrations will generally yield more CH₄ than wastewater with lower COD (or BOD) concentrations. BOD represents the amount of oxygen that would be required to completely consume the organic matter contained in the wastewater through aerobic decomposition processes, while COD measures the total material available for chemical oxidation (both biodegradable and nonbiodegradable). The BOD value is most commonly expressed in milligrams of oxygen consumed per liter of sample during 5 days of incubation at 20°C, or BOD₅. Throughout the rest of this chapter, the term "BOD" refers to BOD₅. Because BOD is an aerobic parameter, it is preferable to use COD to estimate CH₄ production, since CH₄ is produced only in anaerobic conditions. Where present, biogas recovery and flaring operations reduce the amount of CH₄ generated that is actually emitted. Per IPCC guidelines (IPCC 2019), emissions from anaerobic sludge digestion, including biogas recovery and flaring operations, where the digester's primary use is for treatment of wastewater treatment solids, are reported under Wastewater Treatment. The principal factor in determining the N₂O generation potential of wastewater is the amount of N in the wastewater. The variability of N in the influent to the treatment system, as well as the operating conditions of the treatment system itself, also impact the N₂O generation potential. The methods and underlying data sources to estimate emissions from are described in further detail in the "Methodology and Time Series Consistency" section below for treatment of domestic and industrial wastewater.

Overall, treatment of wastewater emitted 42.0 MMT CO₂ Eq. in 2021. Methane (CH₄) emissions from domestic wastewater treatment and discharge were estimated to be 11.9 MMT CO₂ Eq. (424 kt CH₄) and 2.0 MMT CO₂ Eq. (72 kt CH₄), respectively, totaling 13.9 MMT CO₂ Eq. (496 kt CH₄) in 2021. Emissions remained fairly steady from 1990 through 2002 but have decreased since that time due to decreasing percentages of wastewater being treated in anaerobic systems, generally including reduced use of on-site septic systems and central anaerobic treatment systems (EPA 1992, 1996, 2000, and 2004; U.S. Census Bureau 2019). In 2021, CH₄ emissions from industrial wastewater treatment and discharge were estimated to be 6.6 MMT CO₂ Eq. (237 kt CH₄) and 0.5 MMT CO₂ Eq. (19 kt CH₄), respectively, totaling 7.2 MMT CO₂ Eq. (256 kt CH₄). Industrial emissions from wastewater treatment have generally increased across the time series through 1999 and then fluctuated up and correspond with production changes from the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and brewery industries. Industrial wastewater emissions have generally seen an uptick since 2016. Table 7-7 and Table 7-8 provide CH4 emission estimates from domestic and industrial wastewater treatment.

With respect to N₂O, emissions from domestic wastewater treatment and discharge in 2021 were estimated to be 16.2 MMT CO₂ Eq. (61 kt N₂O) and 4.2 MMT CO₂ Eq. (16 kt N₂O), respectively, totaling 20.4 MMT CO₂ Eq. (77 kt N₂O). Nitrous oxide emissions from wastewater treatment processes gradually increased across the time series because of increasing U.S. population and protein consumption. In 2021, N2O emissions from industrial wastewater treatment and discharge were estimated to be 0.4 MMT CO₂ Eq. (1.5 kt N₂O) and 0.1 MMT CO₂ Eq. (0.3 kt N₂O), respectively, totaling 0.5 MMT CO₂ Eq. (1.7 kt N₂O). Industrial emission sources have gradually increased across the time series with production changes associated with the treatment of wastewater from the pulp and paper manufacturing, meat and poultry processing, petroleum refining, and brewery industries. Table 7-7 and Table 7-8 provide N₂O emission estimates from domestic wastewater treatment.

Table 7-7: CH₄ and N₂O Emissions from Domestic and Industrial Wastewater Treatment (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
CH ₄	22.7	22.7	21.5	21.4	21.2	21.3	21.1
Domestic Treatment	15.1	14.6	12.6	12.3	11.9	12.1	11.9
Domestic Effluent	1.4	1.4	2.0	2.0	2.0	2.0	2.0
Industrial Treatment ^a	5.5	6.1	6.4	6.5	6.6	6.6	6.6
Industrial Effluenta	0.7	0.6	0.6	0.6	0.6	0.5	0.5
N_2O	14.8	18.1	20.6	21.2	21.3	20.9	20.9
Domestic Treatment	10.5	13.7	15.7	16.2	16.4	16.1	16.2
Domestic Effluent	3.9	3.9	4.4	4.5	4.5	4.3	4.2
Industrial Treatment ^b	0.3	0.4	0.4	0.4	0.5	0.4	0.4
Industrial Effluent ^b	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Total	37.5	40.7	42.2	42.5	42.5	42.2	42.0

^a Industrial activity for CH₄ includes the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and breweries industries.

Note: Totals may not sum due to independent rounding.

Table 7-8: CH₄ and N₂O Emissions from Domestic and Industrial Wastewater Treatment (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
CH ₄	811	809	770	763	755	761	753
Domestic Treatment	539	521	449	438	426	433	424
Domestic Effluent	49	49	72	73	73	72	72
Industrial Treatmenta	196	216	229	232	236	237	237
Industrial Effluent ^a	27	22	20	20	20	19	19
N_2O	56	68	78	80	80	79	79
Domestic Treatment	40	52	59	61	62	61	61
Domestic Effluent	15	15	17	17	17	16	16
Industrial Treatment ^b	1	1	1	2	2	1	1
Industrial Effluent ^b	+	+	+	+	+	+	+

⁺ Does not exceed 0.5 kt.

Note: Totals by gas may not sum due to independent rounding.

^b Industrial activity for N₂O includes the pulp and paper manufacturing, meat and poultry processing, starch-based ethanol production, and petroleum refining.

a Industrial activity for CH₄ includes the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and breweries industries.

b Industrial activity for N₂O includes the pulp and paper manufacturing, meat and poultry processing, starch-based ethanol production, and petroleum refining.

Methodology and Time-Series Consistency

The methodologies presented in IPCC (2019) form the basis of the CH₄ and N₂O emission estimates for both domestic and industrial wastewater treatment and discharge. Domestic wastewater treatment follows the IPCC Tier 2 methodology for key pathways, while domestic wastewater discharge follows IPCC Tier 2 discharge methodology and emission factors. Default factors from IPCC (2019) or IPCC (2006) are used when there are insufficient U.S.-specific data to develop a U.S.-specific factor, though IPCC default factors are often based in part on data from or representative of U.S. wastewater treatment systems. Industrial wastewater treatment follows IPCC Tier 1 and wastewater treatment discharge follows Tier 1 or Tier 2 methodologies, depending on the industry. EPA will continue to implement the Tier 2 discharge methodology for more industries as data are investigated and time and resource constraints allow (see the Planned Improvements section below). Similar to domestic wastewater, IPCC default factors are used when there are insufficient U.S.-specific data to develop a U.S.-specific factor.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. In the following cases, the source used to capture activity data changed over the time series. EPA transitioned to these newer data sources to continue estimating emissions in a way that ensured both accuracy and continuity. For example:

- Starch-based ethanol production data: the source used for 1990 to 2017 production was no longer available after 2017. A new, publicly available source was identified and is used for production in 2015-2021. However, this source does not have sufficient data for the earlier timeseries. EPA confirmed with experts familiar with the sources that combining these two sources to populate the time series was accurate (ERG 2019; Lewis 2019) and does not present any significant discontinuities in the time series.
- Brewery production data: the source used for production changed in 2007 to publish craft brewery
 production broken out by size but does not include data prior to 2007. Therefore, rather than estimating
 total production data prior to 2007 with this source, another data source was used to ensure accuracy of
 production data through the time series (ERG 2018b).

Refer to the Recalculations section below for details on updates implemented to improve accuracy, consistency and/or completeness of the time series.

Domestic Wastewater CH₄ Emission Estimates

Domestic wastewater CH₄ emissions originate from both septic systems and from centralized treatment systems. Within these centralized systems, CH₄ emissions can arise from aerobic systems that liberate dissolved CH₄ that formed within the collection system or that are designed to have periods of anaerobic activity (e.g., constructed wetlands and facultative lagoons), anaerobic systems (anaerobic lagoons and anaerobic reactors), and from anaerobic sludge digesters when the captured biogas is not completely combusted. Emissions will also result from the discharge of treated effluent from centralized wastewater plants to waterbodies where carbon accumulates in sediments (typically slow-moving systems, such as lakes, reservoirs, and estuaries). The systems with emissions estimates are:

- Septic systems (A);
- Centralized treatment aerobic systems (B), including aerobic systems (other than constructed wetlands)
 (B1), constructed wetlands only (B2), and constructed wetlands used as tertiary treatment (B3);

 $^{^7}$ IPCC (2019) updates, supplements, and elaborates the 2006 IPCC Guidelines where gaps or out-of-date science have been identified. EPA used these methodologies to improve completeness and include sources of greenhouse gas emissions that have not been estimated prior to the 1990-2019 Inventory, such as N_2O emissions from industrial wastewater treatment, and to improve emission estimates for other sources, such as emissions from wastewater discharge and centralized wastewater treatment.

- Centralized anaerobic systems (C);
- Anaerobic sludge digesters (D); and
- Centralized wastewater treatment effluent (E).

Methodological equations for each of these systems are presented in the subsequent subsections; total domestic CH₄ emissions are estimated as follows:

Equation 7-4: Total Domestic CH₄ Emissions from Wastewater Treatment and DischargeTotal Domestic CH₄ Emissions from Wastewater Treatment and Discharge (kt) = A + B + C + D + E

Table 7-9 presents domestic wastewater CH₄ emissions for both septic and centralized systems, including anaerobic sludge digesters and emissions from centralized wastewater treatment effluent, in 2021.

Table 7-9: Domestic Wastewater CH₄ Emissions from Septic and Centralized Systems (2021, kt, MMT CO₂ Eq. and Percent)

	CH ₄ Emissions (kt)	CH₄ Emissions (MMT CO₂ Eq.)	% of Domestic Wastewater CH ₄
Septic Systems (A)	223	6.2	45.0
Centrally-Treated Aerobic Systems (B)	74	2.1	14.8
Centrally-Treated Anaerobic Systems (C)	119	3.3	24.1
Anaerobic Sludge Digesters (D)	8	0.2	1.6
Centrally-Treated Wastewater Effluent (E)	72	2.0	14.5
Total	496	13.9	100

Emissions from Septic Systems:

Methane emissions from septic systems were estimated by multiplying the U.S. population by the percent of wastewater treated in septic systems (about 17 percent in 2021; U.S. Census Bureau 2019) and an emission factor and then converting the result to kt/year.

U.S. population data were taken from historic U.S. Census Bureau national population totals data and include the populations of the United States and Puerto Rico (U.S. Census Bureau 2002; U.S. Census Bureau 2011; U.S. Census Bureau 2021a and 2021b; Instituto de Estadísticas de Puerto Rico 2021). Population data for American Samoa, Guam, Northern Mariana Islands, and the U.S. Virgin Islands were taken from the U.S. Census Bureau International Database (U.S. Census Bureau 2022). Table 7-12 presents the total U.S. population for 1990 through 2021. The fraction of the U.S. population using septic systems or centralized treatment systems is based on data from the *American Housing Surveys* (U.S. Census Bureau 2019).

Methane emissions for septic systems are estimated as follows:

Equation 7-5: CH₄ Emissions from Septic Systems

Emissions from Septic Systems (U. S. Specific) = A = $US_{POP} \times (T_{SEPTIC}) \times (EF_{SEPTIC}) \times 1/10^9 \times 365.25$

Table 7-10: Variables and Data Sources for CH₄ Emissions from Septic Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
US _{POP}	U.S. population ^a	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau (2002); Instituto de Estadísticas de Puerto Rico (2021) 2000-2009: U.S. Census Bureau (2011)

Variable.	Veriable Description	11-24-	Inventory Years: Source of
Variable	Variable Description	Units	Value
			2010-2019: U.S. Census
			Bureau (2021a)
			2020-2021: U.S. Census
			Bureau (2021b)
			U.S. Territories other than
			Puerto Rico:
			1990-2021: U.S. Census
			Bureau (2022)
			Odd years from 1989 through
			2019: U.S. Census Bureau
			(2019)
_	Descent treated in centic systems	%	Data for intervening years
T _{SEPTIC}	Percent treated in septic systems ^a	70	obtained by linear
			interpolation
			2020-2021: Forecasted from
			the rest of the time series
FF	Methane emission factor – septic systems	a CII /aanita /da.	1990-2021: Leverenz et al.
EF _{SEPTIC}	(10.7)	g CH₄/capita/day	(2010)
1/109	Conversion factor	g to kt	Standard conversion
365.25	Conversion factor	Days in a year	Standard conversion

^a Value of activity data varies over the Inventory time series.

Emissions from Centrally Treated Aerobic and Anaerobic Systems:

Methane emissions from POTWs depend on the total organics in wastewater. Table 7-12 presents the total organically degradable material in wastewater, or TOW, for 1990 through 2021. The TOW was determined using BOD generation rates per capita weighted average both with and without kitchen scraps as well as an estimated percent of housing units that utilize kitchen garbage disposals. Households with garbage disposals (with kitchen scraps or ground up food scraps) typically have wastewater with higher BOD than households without garbage disposals due to increased organic matter contributions (ERG 2018a). The equations are as follows:

Equation 7-6: Total Wastewater BOD5 Produced per Capita (U.S.-Specific [ERG 2018a])

 $BOD_{gen\ rate}\ (kg/capita/day) = BOD_{without\ scrap} \times (1 - \%kitchen\ disposal) + BOD_{with\ scraps} \times (\%kitchen\ disposal)$

Equation 7-7: Total Organically Degradable Material in Domestic Wastewater (IPCC 2019 [Eq. 6.3])

$$\text{TOW}\left(\frac{\text{Gg BOD}}{\text{vear}}\right) = \text{US}_{POP} \times \text{BOD}_{gen \, rate} \times 365.25 \times \frac{1}{10^6}$$

Table 7-11: Variables and Data Sources for Organics in Domestic Wastewater

Variable	Variable Description	Units	Inventory Years: Source of Value
BOD _{gen rate}	Total wastewater BOD produced per capita	kg/capita/day	1990-2021: Calculated
BOD _{without scrap}	Wastewater BOD produced per capita without kitchen scraps ^a	kg/capita/day	1990-2003: Metcalf & Eddy (2003)
BOD with scraps	Wastewater BOD produced per capita with kitchen scraps ^a	kg/capita/day	2004-2013: Linear interpolation 2014-2021: Metcalf & Eddy (2014)
% kitchen disposal	Percent of housing units with kitchen	%	1990-2013: U.S. Census

	kitchen disposal ^a		Bureau (2013) 2014-2021: Forecasted from the rest of the time series
TOW	Total wastewater BOD Produced per Capita ^a	Gg BOD/year	1990-2021: Calculated, ERG (2018a)
US _{POP}	U.S. population ^a	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau (2002); Instituto de Estadísticas de Puerto Rico (2021) 2000-2009: U.S. Census Bureau (2011) 2010-2019: U.S. Census Bureau (2021a) 2020-2021: U.S. Census Bureau (2021b) U.S. Territories other than Puerto Rico: 1990-2021: U.S. Census Bureau (2022)
365.25	Conversion factor	Days in a year	Standard conversion
1/106	Conversion factor	kg to Gg	Standard conversion

^a Value of activity data varies over the Inventory time series.

Table 7-12: U.S. Population (Millions) and Domestic Wastewater TOW (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Population	253	300	329	330	332	335	336
TOW	8,131	9,624	9,894	9,958	10,019	10,132	10,159

Sources: U.S. Census Bureau (2002); U.S. Census Bureau (2011); U.S. Census Bureau (2021a and 2021b); Instituto de Estadísticas de Puerto Rico (2021); U.S. Census Bureau (2022); ERG (2018a).

Methane emissions from POTWs were estimated by multiplying the total organics in centrally treated wastewater (total BOD₅) produced per capita in the United States by the percent of wastewater treated centrally, or percent collected (about 83 percent in 2021), the correction factor for additional industrial BOD discharged to the sewer system, the relative percentage of wastewater treated by aerobic systems (other than constructed wetlands), constructed wetlands only, and anaerobic systems, and the emission factor⁸ for aerobic systems, constructed wetlands only, and anaerobic systems. Methane emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow from treatment to constructed wetlands, wastewater BOD concentration entering tertiary treatment, constructed wetlands emission factor, and then converting to kt/year.

In the United States, the removal of sludge⁹ from wastewater reduces the biochemical oxygen demand of the wastewater that undergoes aerobic treatment. The amount of this reduction (S) is estimated using the default IPCC (2019) methodology and multiplying the amount of sludge removed from wastewater treatment in the United States by the default factors in IPCC (2019) to estimate the amount of BOD removed based on whether the treatment system has primary treatment with no anaerobic sludge digestion (assumed to be zero by expert

⁸ Emission factors are calculated by multiplying the maximum CH₄-producing capacity of domestic wastewater (B_0 , 0.6 kg CH₄/kg BOD) and the appropriate methane correction factors (MCF) for aerobic (0.03) and anaerobic (0.8) systems (IPCC 2019, Table 6.3) and constructed wetlands (0.4) (IPCC 2014, Table 6.4).

⁹ Throughout this document, the term "sludge" refers to the solids separated during the treatment of municipal wastewater. The definition includes domestic septage. "Biosolids" refers to treated sewage sludge that meets the EPA pollutant and pathogen requirements for land application and surface disposal.

judgment), primary treatment with anaerobic sludge digestion, or secondary treatment without primary treatment. The organic component removed from anaerobic wastewater treatment and the amount of CH₄ recovered or flared from both aerobic and anaerobic wastewater treatment were set equal to the IPCC default of zero.

The methodological equations for CH₄ emissions from aerobic and anaerobic systems are:

Equation 7-8: Total Domestic CH₄ Emissions from Centrally Treated Aerobic Systems

Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands)(B1) + Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only)(B2) + Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment)(B3) = B

where,

Equation 7-9: Total Organics in Centralized Wastewater Treatment [IPCC 2019 (Eq. 6.3A)]

$$TOW_{CENTRALIZED}$$
 $\left(\frac{Gg\ BOD}{year}\right) = TOW \times T_{CENTRALIZED} \times I_{COLLECTED}$

Table 7-13: Variables and Data Sources for Organics in Centralized Domestic Wastewater

Variable	Variable Description	Units	Inventory Years: Source of Value
Centrally Treated	Organics (Gg BOD/year)		
TOW _{CENTRALIZED}	Total organics in centralized wastewater treatment ^a	Gg BOD/year	1990-2021: Calculated
TOW	Total wastewater BOD Produced per Capita ^a	Gg BOD/capita/year	1990-2021: Calculated, ERG (2018a)
T _{CENTRALIZED}	Percent collected ^a	%	1990-2019: U.S. Census Bureau (2019) Data for intervening years obtained by linear interpolation 2020-2021: Forecasted from the rest of the time series
I _{COLLECTED}	Correction factor for additional industrial BOD discharged (1.25)	No units	1990-2021: IPCC (2019) Eq. 6.3a

^a Value of this activity data varies over the time series.

Equation 7-10: Organic Component Removed from Aerobic Wastewater Treatment (IPCC 2019 [Eq. 6.3B])

$$\begin{split} S_{aerobic}\left(\frac{Gg}{year}\right) = \ S_{mass} \ \times \ \left[\left(\% \ aerobic \frac{w}{primary} \times \ K_{rem,aer_{prim}}\right) + \left(\% \ aerobic \frac{w}{out} primary \ \times \ K_{rem,aer_{noprim}}\right) + \\ \left(\% aerobic + digestion \ \times \ K_{rem,aer_{digest}}\right)\right] \times \ 1000 \end{split}$$

Equation 7-11: Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands) (IPCC 2019 [Eq. 6.1])

$$B1(kt\ CH_4/year) = [(TOW_{CENTRALIZED}) \times (\%\ aerobic_{OTCW}) - S_{aerobic}] \times EF_{aerobic} - R_{aerobic}$$

Table 7-14: Variables and Data Sources for CH₄ Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands)

Variable	Variable Description	Units	Inventory Years: Source of Value		
Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands) (kt CH ₄ /year)					
Saerobic Organic component removed from aerobic wastewater treatmenta Organic component removed from aerobic wastewater treatmenta BOD/year 1990-2021: Calculated					
S _{mass}	Raw sludge removed from wastewater treatment as dry mass ^a	Tg dry weight/year	1988: EPA (1993c); EPA (1999) 1990-1995: Calculated based on sewage sludge production change		

Variable	Variable Description	Units	Inventory Years: Source of Value
			per year EPA (1993c); EPA (1999); Beecher et al. (2007) 1996: EPA (1999) 2004: Beecher et al. (2007) Data for intervening years obtained by linear interpolation 2005-2017: Interpolated 2018: NEBRA (2022), as described in ERG (2022) 2019-2021: Forecasted from the rest of the time series. Methodology for estimating sludge generated from the U.S. territories provided in ERG (2022).
% aerobic _{otcw}	Percent of flow to aerobic systems, other than wetlands ^a	%	1990, 1991: Set equal to 1992
% aerobic w/primary	Percent of aerobic systems with primary treatment and no anaerobic sludge digestion (0)	%	1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, 2004), respectively Data for intervening years obtained
% aerobic w/out primary	Percent of aerobic systems without primary treatment ^a	%	by linear interpolation. 2005-2021: Forecasted from the rest
%aerobic+digestion	Percent of aerobic systems with primary and anaerobic sludge digestion ^a	%	of the time series
K _{rem,aer_prim}	Sludge removal factor for aerobic treatment plants with primary treatment (mixed primary and secondary sludge, untreated or treated aerobically) (0.8)	kg BOD/kg sludge	
K _{rem,aer_noprim}	Sludge removal factor for aerobic wastewater treatment plants without separate primary treatment (1.16)	kg BOD/kg sludge	1990-2021: IPCC (2019) Table 6.6a
Krem,aer_digest	Sludge removal factor for aerobic treatment plants with primary treatment and anaerobic sludge digestion (mixed primary and secondary sludge, treated anaerobically) (1)	kg BOD/kg sludge	
EF _{aerobic}	Emission factor – aerobic systems (0.018)	kg CH₄/kg BOD	1990-2021: IPCC (2019) Table 6.3
R _{aerobic}	Amount CH ₄ recovered or flared from aerobic wastewater treatment (0)	kg CH₄/year	1990-2021: IPCC (2019) Eq. 6.1
1000	Conversion factor	metric tons to kilograms	Standard conversion

^a Value of this activity data varies over the time series.

Constructed wetlands exhibit both aerobic and anaerobic treatment (partially anaerobic treatment) but are referred to in this chapter as aerobic systems. Constructed wetlands may be used as the sole treatment unit at a centralized wastewater treatment plant or may serve as tertiary treatment after simple settling and biological treatment. Emissions from all constructed wetland systems were included in the estimates of emissions from centralized wastewater treatment plant processes and effluent from these plants. Methane emissions equations from constructed wetlands used as sole treatment were previously described. Methane emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow from treatment to constructed wetlands, wastewater BOD concentration entering tertiary treatment, constructed wetlands emission factor, and then converting to kt/year.

For constructed wetlands, an IPCC default emission factor for surface flow wetlands was used. This is the most conservative factor for constructed wetlands and was recommended by IPCC (2014) when the type of constructed wetland is not known. A median BOD_5 concentration of 9.1 mg/L was used for wastewater entering constructed wetlands used as tertiary treatment based on U.S. secondary treatment standards for POTWs. This median value is based on plants generally utilizing simple settling and biological treatment (EPA 2013). Constructed wetlands do not have secondary sludge removal.

Equation 7-12: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only) [IPCC 2014 (Eq. 6.1)]

B2
$$\left(\frac{\text{kt CH}_4}{\text{year}}\right) = \left[\left(\text{TOW}_{\text{CENTRALIZED}}\right) \times \left(\% \text{ aerobic}_{\text{CW}}\right)\right] \times \left(EF_{\text{CW}}\right)$$

Equation 7-13: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment) (U.S. Specific)

B3
$$\left(\frac{\text{kt CH}_4}{\text{year}}\right) = \left[\left(\text{POTW}_{\text{flow}_{\text{CW}}}\right) \times \left(\text{BOD}_{\text{CW,INF}}\right) \times 3.785 \times \left(\text{EF}_{\text{CW}}\right)\right] \times \frac{1}{10^6} \times 365.25$$

Table 7-15: Variables and Data Sources for CH₄ Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands)

Variable	Variable Description	Units	Inventory Years: Source of Value		
Emissions from Constructed We	etlands Only (kt CH ₄ /year)				
TOW _{CENTRALIZED}	Total organics in centralized wastewater treatment ^a	Gg BOD/year	1990-2021: Calculated		
% aerobic _{cw}	Flow to aerobic systems, constructed wetlands used as sole treatment / total flow to POTWs. ^a	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series		
EF _{CW}	Emission factor for constructed wetlands (0.24)	kg CH₄/kg BOD	1990-2021: IPCC (2014)		
Emissions from Constructed Wetlands used as Tertiary Treatment (kt CH4/year)					
POTW_flow_CW	Wastewater flow to POTWs that use constructed wetlands as tertiary treatment ^a	MGD	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series		
BOD _{CW,INF}	BOD concentration in wastewater entering the constructed wetland (9.1)	mg/L	1990-2021: EPA (2013)		
3.785	Conversion factor	liters to gallons	Standard conversion		
EF _{CW}	Emission factor for constructed wetlands (0.24)	kg CH₄/kg BOD	1990-2021: IPCC (2014)		
1/106	Conversion factor	kg to kt	Standard conversion		
365.25	Conversion factor	Days in a year	Standard conversion		

^a Value of this activity data varies over the time series.

Data sources and methodologies for centrally treated anaerobic systems are similar to those described for aerobic systems, other than constructed wetlands. See discussion above.

Equation 7-14: Emissions from Centrally Treated Anaerobic Systems [IPCC 2019 (Eq. 6.on)]

$$C\left(\frac{\text{kt CH}_4}{\text{year}}\right) = \left[\left(\text{TOW}_{\text{CENTRALIZED}}\right) \times \left(\% \text{ anaerobic}\right) - S_{\text{anaerobic}}\right] \times EF_{\text{anaerobic}} - R_{\text{anaerobic}}$$

Table 7-16: Variables and Data Sources for CH₄ Emissions from Centrally Treated Anaerobic Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Centrally Trea	ted Anaerobic Systems (kt CH ₄ /year)		
TOW _{CENTRALIZED}	Total organics in centralized wastewater treatment ^a	Gg BOD/year	1990-2021: Calculated
% anaerobic	Percent centralized wastewater that is anaerobically treated ^a	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, 2004a), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
S _{anaerobic}	Organic component removed from anaerobic wastewater treatment (0)	Gg/year	
EF _{anaerobic}	Emission factor for anaerobic reactors/deep lagoons (0.48)	kg CH₄/kg BOD	1990-2021: IPCC (2019) Table 6.3
R _{anaerobic}	Amount CH ₄ recovered or flared from anaerobic wastewater treatment (0)	kg CH ₄ /year	

^a Value of this activity data varies over the time series.

Emissions from Anaerobic Sludge Digesters:

Total CH₄ emissions from anaerobic sludge digesters were estimated by multiplying the wastewater influent flow to POTWs with anaerobic sludge digesters, the cubic feet of digester gas generated per person per day divided by the flow to POTWs, the fraction of CH₄ in biogas, the density of CH₄, one minus the destruction efficiency from burning the biogas in an energy/thermal device and then converting the results to kt/year.

Equation 7-15: Emissions from Anaerobic Sludge Digesters (U.S. Specific)

$$D\left(\frac{\text{kt CH}_4}{\text{year}}\right) = \left[\left(\text{POTW}_{\text{flow}_{\text{AD}}}\right) \times \frac{\text{biogas gen}}{100}\right] \times 0.0283 \times \left(\text{FRAC}_{\text{CH}_4}\right) \times 365.25 \times (662) \times (1 - \text{DE}) \times \frac{1}{10^9} \times 10^{-100} \times 10^{-$$

Table 7-17: Variables and Data Sources for Emissions from Anaerobic Sludge Digesters

Variable	Variable Description	Units	Inventory years: Source of Value	
Emissions from Anaerobic Sludge Digesters (kt CH ₄ /year)				
POTW_flow_AD	POTW Flow to Facilities with Anaerobic Sludge Digesters ^a	MGD	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, and 2004), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series	
biogas gen	Gas Generation Rate (1.0)	ft³/capita/day	1990-2021: Metcalf & Eddy (2014)	

			Inventory years: Source of
Variable	Variable Description	Units	Value
100	Per Capita POTW Flow (100)	gal/capita/day	1990-2021: Ten-State Standards (2004)
0.0283	Conversion factor	ft³ to m³	Standard Conversion
FRAC _{CH4}	Proportion of Methane in Biogas (0.65)	No units	1990-2021: Metcalf & Eddy
ТКАССН4	Proportion of Methane in Biogas (0.03)	NO units	(2014)
365.25	Conversion factor	Days in a year	Standard conversion
662	Density of Methane (662)	g CH ₄ /m ³ CH ₄	1990-2021: EPA (1993a)
DE	Destruction Efficiency (99% converted to fraction)	No units	1990-2021: EPA (1998b); CAR (2011); Sullivan (2007); Sullivan (2010); and UNFCCC (2012)
1/109	Conversion factor	g to kt	Standard conversion

^a Value of this activity data varies over the time series.

Emissions from Discharge of Centralized Treatment Effluent:

Methane emissions from the discharge of wastewater treatment effluent were estimated by multiplying the total BOD of the discharged wastewater effluent by an emission factor associated with the location of the discharge. The BOD in treated effluent was determined by multiplying the total organics in centrally treated wastewater by the percent of wastewater treated in primary, secondary, and tertiary treatment, and the fraction of organics remaining after primary treatment (one minus the fraction of organics removed from primary treatment, secondary treatment, and tertiary treatment).

Equation 7-16: Emissions from Centrally Treated Systems Discharge (U.S.-Specific)

$$E\left(\frac{\text{kt CH}_4}{\text{year}}\right) = (\text{TOW}_{\text{RLE}} \times \text{EF}_{\text{RLE}}) + (\text{TOW}_{\text{Other}} \times \text{EF}_{\text{Other}})$$

where,

Equation 7-17: Total Organics in Centralized Treatment Effluent (IPCC 2019 [Eq. 6.3D])

$$TOW_{EFFtreat,CENTRALIZED}\left(\frac{Gg\ BOD}{year}\right)\\ = \left[TOW_{CENTRALIZED}\times\%\ primary\times\left(1-TOW_{rem,PRIMARY}\right)\right] + \left[TOW_{CENTRALIZED}\times\%\ secondary\times\left(1-TOW_{rem,SECONDARY}\right)\right] + \left[TOW_{CENTRALIZED}\times\%\ tertiary\times\left(1-TOW_{rem,TERTIARY}\right)\right]$$

Equation 7-18: Total Organics in Effluent Discharged to Reservoirs, Lakes, or Estuaries (U.S.-Specific)

$$TOW_{RLE}\left(\frac{Gg\ BOD}{vear}\right) = TOW_{EFFtreat,CENTRALIZED} \times Percent_{RLE}$$

Equation 7-19: Total Organics in Effluent Discharged to Other Waterbodies (U.S.-Specific)

$$TOW_{Other} \left(\frac{Gg BOD}{year} \right) = TOW_{EFFtreat, CENTRALIZED} \times Percent_{Other}$$

Table 7-18: Variables and Data Sources for CH₄ Emissions from Centrally Treated Systems Discharge

Variable	Variable Description	Units	Source of Value
TOW/	Total organics in centralized treatment effluenta	Gg	1990-2021:
TOW _{EFFtreat} ,CENTRALIZED	Total organics in centralized treatment emdent	BOD/year	Calculated
TOW	Total arganics in controlized westewater treatment?	Gg	1990-2021:
TOW _{CENTRALIZED}	Total organics in centralized wastewater treatment ^a	BOD/year	Calculated
% primary	Percent of primary domestic centralized treatment ^a	%	

Variable	Variable Description	Units	Source of Value
% secondary	Percent of secondary domestic centralized treatment ^a	%	1990,1991: Set
% tertiary	Percent of tertiary domestic centralized treatment ^a	%	equal to 1992. 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012), respectively Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series
TOW _{rem,PRIMARY}	Fraction of organics removed from primary domestic centralized treatment (0.4)	No units	
TOW _{rem,SECONDARY}	Fraction of organics removed from secondary domestic centralized treatment (0.85)	No units	1990-2021: IPCC (2019) Table 6.6B
TOW _{rem,TERTIARY}	Fraction of organics removed from tertiary domestic centralized treatment (0.90)	No units	
TOW _{RLE}	Total organics in effluent discharged to reservoirs, lakes, and estuaries ^a	Gg BOD/year	1990-2021:
TOW _{Other}	Total organics in effluent discharge to other waterbodies ^a	Gg BOD/year	Calculated
EF _{RLE}	Emission factor (discharge to reservoirs/lakes/estuaries) (0.114)	kg CH₄/kg BOD	1990-2021: IPCC
EF _{Other}	Emission factor (discharge to other waterbodies) (0.021)	kg CH₄/kg BOD	(2019) Table 6.8
Percent _{RLE}	% discharged to reservoirs, lakes, and estuaries ^a	%	1990-2010: Set
Percent _{Other}	% discharged to other waterbodies ^a	%	equal to 2010 2010: ERG (2021a) 2011: Obtained by linear interpolation 2012: ERG (2021a) 2013-2021: Set equal to 2012

^a Value of this activity data varies over the time series.

Industrial Wastewater CH₄ Emission Estimates

Industrial wastewater CH₄ emissions originate from on-site treatment systems, typically comprised of biological treatment operations. The collection systems at an industrial plant are not as extensive as domestic wastewater sewer systems; therefore, it is not expected that dissolved CH₄ will form during collection. However, some treatment systems are designed to have anaerobic activity (e.g., anaerobic reactors or lagoons), or may periodically have anaerobic conditions form (facultative lagoons or large stabilization basins). Emissions will also result from discharge of treated effluent to waterbodies where carbon accumulates in sediments (typically slow-moving systems, such as lakes, reservoirs, and estuaries).

Industry categories that are likely to produce significant CH₄ emissions from wastewater treatment were identified and included in the Inventory. The main criteria used to identify U.S. industries likely to generate CH₄ from wastewater treatment are whether an industry generates high volumes of wastewater, whether there is a high organic wastewater load, and whether the wastewater is treated using methods that result in CH₄ emissions. The

top six industries that meet these criteria are pulp and paper manufacturing; meat and poultry processing; vegetables, fruits, and juices processing; starch-based ethanol production; petroleum refining; and breweries. Wastewater treatment and discharge emissions for these sectors for 2021 are displayed in Table 7-19 below. Further discussion of wastewater treatment for each industry is included below.

Table 7-19: Total Industrial Wastewater CH₄ Emissions by Sector (2021, MMT CO₂ Eq. and Percent)

Industry	CH ₄ Emissions (MMT CO ₂ Eq.)	% of Industrial Wastewater CH ₄
Meat & Poultry	5.7	78.9
Pulp & Paper	0.8	11.6
Fruit & Vegetables	0.2	3.3
Ethanol Refineries	0.2	2.3
Breweries	0.1	2.2
Petroleum Refineries	0.2	1.6
Total	7.2	100

Note: Totals may not sum due to independent rounding.

Emissions from Industrial Wastewater Treatment Systems:

Equation 7-20 presents the general IPCC equation (Equation 6.4, IPCC 2019) to estimate methane emissions from each type of treatment system used for each industrial category.

Equation 7-20: Total CH₄ Emissions from Industrial Wastewater

 CH_4 (industrial sector) = $[(TOW_i - S_i) \times EF - R_i]$

where,

CH₄ (industrial sector) = Total CH₄ emissions from industrial sector wastewater treatment (kg/year)

I = Industrial sector

TOW_i = Total organics in wastewater for industrial sector *i* (kg COD/year)

 S_i = Organic component removed from aerobic wastewater treatment for industrial

sector i (kg COD/year)

EF = System-specific emission factor (kg CH₄/kg COD) R_i = Methane recovered for industrial sector *i* (kg CH₄/year)

Equation 7-21 presents the general IPCC equation to estimate the total organics in wastewater (TOW) for each industrial category.

Equation 7-21: TOW in Industry Wastewater Treatment Systems

$$TOW_i = P_i \times W_i \times COD_i$$

where,

TOW_i = Total organically degradable material in wastewater for industry *i* (kg COD/yr)

i = Industrial sector

 P_i = Total industrial product for industrial sector i (t/yr)

W_i = Wastewater outflow (m³/t product)

COD_i = Chemical oxygen demand (industrial degradable organic component in wastewater) (kg

COD/m³)

The annual industry production is shown in Table 7-20, and the average wastewater outflow and the organics loading in the outflow is shown in Table 7-21.

For some industries, U.S.-specific data on organics loading is reported as BOD rather than COD. In those cases, an industry-specific COD:BOD ratio is used to convert the organics loading to COD.

The amount of organics treated in each type of wastewater treatment system was determined using the percent of wastewater in the industry that is treated on site and whether the treatment system is anaerobic, aerobic or partially anaerobic. Table 7-22 presents the industrial wastewater treatment activity data used in the calculations and described in detail in ERG (2008a), ERG (2013a), ERG (2013b), and ERG (2021a). For CH₄ emissions, wastewater treated in anaerobic lagoons or reactors was categorized as "anaerobic", wastewater treated in aerated stabilization basins or facultative lagoons were classified as "ASB" (meaning there may be pockets of anaerobic activity), and wastewater treated in aerobic systems such as activated sludge systems were classified as "aerobic/other."

The amount of organic component removed from aerobic wastewater treatment as a result of sludge removal (Saerobic) was either estimated as an industry-specific percent removal, if available, or as an estimate of sludge produced by the treatment system and IPCC default factors for the amount of organic component removed (Krem), using one of the following equations. Table 7-23 presents the sludge variables used for industries with aerobic wastewater treatment operations (i.e., pulp and paper, fruit/vegetable processing, and petroleum refining).

Equation 7-22: Organic Component Removed from Aerobic Wastewater Treatment – Pulp, Paper, and Paperboard

 $S_{pulp,asb} = TOW_{pulp} \times \% removal w/primary$

where,

S_{pulp,asb} = Organic component removed from pulp and paper wastewater during primary treatment before treatment in aerated stabilization basins (Gg COD/yr)

 TOW_{pulp} = Total organically degradable material in pulp and paper wastewater (Gg

COD/yr)

% removal w/primary = Percent reduction of organics in pulp and paper wastewater associated with

sludge removal from primary treatment (%)

Equation 7-23: Organic Component Removed from Aerobic Treatment Plants

 $S_{aerobic} = S_{mass} \times K_{rem} \times 10^{-6}$

where,

Saerobic = Organic component removed from fruit and vegetable or petroleum refining wastewater during primary treatment before treatment in aerated stabilization basins (Gg COD/yr)

damb primary treatment science treatment in deletted stability and (e.g. ear

S_{mass} = Raw sludge removed from wastewater treatment as dry mass (kg sludge/yr)

K_{rem} = Sludge factor (kg BOD/kg sludge)

10⁻⁶ = Conversion factor, kilograms to Gigagrams

Equation 7-24: Raw Sludge Removed from Wastewater Treatment as Dry Mass

 $S_{mass} = (S_{prim} + S_{aer}) \times P \times W$

where,

S_{mass} = Raw sludge removed from wastewater treatment as dry mass (kg sludge/yr)

S_{prim} = Sludge production from primary sedimentation (kg sludge/m³)

S_{aer} = Sludge production from secondary aerobic treatment (kg sludge/m³)

P = Production (t/yr)

W = Wastewater Outflow (m³/t)

Default emission factors ¹⁰ from IPCC (2019) were used. Information on methane recovery operations varied by industry. See industry descriptions below.

Table 7-20: U.S. Pulp and Paper, Meat, Poultry, Vegetables, Fruits and Juices, Ethanol, Breweries, and Petroleum Refining Production (MMT)

		Meat (Live Weight	Poultry (Live Weight	Vegetables, Fruits and	Ethanol		Petroleum
Year	Pulp and Papera	Killed)	Killed)	Juices	Production	Breweries	Refining
1990	83.6	27.3	14.6	40.8	2.5	23.9	702.4
2005	92.4	31.4	25.1	45.3	11.7	23.1	818.6
2017	80.3	35.4	28.9	42.4	47.6	21.8	933.5
2018	78.7	36.4	29.4	42.3	48.1	21.5	951.7
2019	76.3	37.4	30.1	41.8	47.1	21.1	940.0
2020	74.7	37.8	30.5	40.6	41.6	21.1	806.5
2021	73.6	38.1	30.5	39.4	44.8	21.2	857.3

^a Pulp and paper production is the sum of market pulp production plus paper and paperboard production. Sources: Pulp and Paper – FAO (2022a) and FAO (2022b); Meat, Poultry, and Fruits and Vegetables – USDA (2022a and 2022b), ERG (2022); Ethanol – Cooper (2018) and RFA (2022a and 2022b); Breweries – Beer Institute (2011) and TTB (2022); Petroleum Refining – EIA (2022).

Table 7-21: U.S. Industrial Wastewater Characteristics Data (2021)

Industry	Wastewater Outflow (m³/ton)	Wastewater BOD (g/L)	Wastewater COD (kg/m³)	COD:BOD Ratio
Pulp and Paper	See Table 7-25	0.3		2.5
Meat Processing	5.3	2.8		3
Poultry Processing	12.5	1.5		3
Fruit/Vegetable Processing	See Table 7-26			1.5
Ethanol Production – Wet Mill	10 ^a	1.5		2
Ethanol Production – Dry Mill	1.25ª	3 ^b		2
Petroleum Refining	0.8		0.45	2.5
Breweries – Craft	3.09		17.6	1.67
Breweries – NonCraft	1.94		17.6	1.67

^a Units are gallons per gallons ethanol produced.

Sources: Pulp and Paper (BOD, COD:BOD) – Malmberg (2018); Meat and Poultry (Outflow, BOD) – ERG (2006a); Meat and Poultry (COD:BOD) – EPA (1997a); Fruit/Vegetables (Outflow, BOD) – CAST (1995), EPA (1974), EPA (1975); Fruit/Vegetables (COD:BOD) – EPA (1997a); Ethanol Production – Wet Mill (Outflow) – Donovan (1996), NRBP (2001), Ruocco (2006b); Ethanol Production – Wet Mill (BOD) – White and Johnson (2003); Ethanol Production – Dry Mill (Outflow and COD) – Merrick (1998), Ruocco (2006a); Ethanol Production (Dry and Wet, COD:BOD) – EPA (1997a); Petroleum Refining (Outflow) – ERG (2013b); Petroleum Refining (COD) – Benyahia et al. (2006); Petroleum Refining (COD:BOD) – EPA (1982); Breweries – Craft BIER (2017); ERG (2018b); Breweries – NonCraft ERG (2018b); Brewers Association (2016a); Breweries (Craft and NonCraft; COD and COD:BOD) – Brewers Association (2016b).

^b Units are COD (g/L).

 $^{^{10}}$ Emission factors are calculated by multiplying the maximum CH₄-producing capacity of wastewater (B₀, 0.25 kg CH₄/kg COD) and the appropriate methane correction factors (MCF) for aerobic (0), partially anaerobic (0.2), and anaerobic (0.8) systems (IPCC 2019), Table 6.3.

Table 7-22: U.S. Industrial Wastewater Treatment Activity Data

	%			% Treated	Aerobically
Industry	Wastewater Treated On Site	% Treated Anaerobically	% Treated Aerobically	% Treated in ASBs	% Treated in Other Aerobic
Pulp and Paper ^b	60	5.2	75.9	38.5	37.4
Meat Processing	33	33a	33	0	33
Poultry Processing	25	25a	25	0	25
Fruit/Vegetable					
Processing	11	0	11	5.5	5.5
Ethanol Production –					
Wet Mill	33.3	33.3	66.7	0	0
Ethanol Production –					
Dry Mill	75	75	25	0	0
Petroleum Refining	62.1	0	62.1	23.6	38.5
Breweries – Craft	0.5	0.5	0	0	0
Breweries - NonCraft	100	99	1	0	1

^a Wastewater is pretreated in anaerobic lagoons prior to aerobic treatment.

Note: Due to differences in data availability and methodology, zero values in the table are for calculation purposes only and may indicate unavailable data.

Sources: ERG (2008a, 2008b); ERG (2013a); ERG (2013b); ERG (2021a).

Table 7-23: Sludge Variables for Aerobic Treatment Systems

	Industry		
Variable	Pulp and	Fruit/Vegetable	Petroleum
	Paper	Processing	Refining
Organic reduction associated with sludge removal (%)	58		
Sludge Production (kg/m³)			
Primary Sedimentation		0.15	
Aerobic Treatment		0.096	0.096
Sludge Factor (kg BOD/kg dry mass sludge)			
Aerobic Treatment w/Primary Sedimentation and No Anaerobic			
Sludge Digestion		0.8	
Aerobic Treatment w/out Primary Sedimentation			1.16

Sources: Organic reduction (pulp) – ERG (2008a); Sludge production – Metcalf & Eddy (2003); Sludge factors – IPCC (2019), Table 6.6a.

Emissions from Discharge of Industrial Wastewater Treatment Effluent:

Methane emissions from discharge of industrial wastewater treatment effluent are estimated via a Tier 1 method for all industries except for pulp, paper, and paperboard. Emissions from discharge of pulp, paper, and paperboard treatment effluent is estimated via a Tier 2 method and is described in the industry-specific data section. Tier 1 emissions from effluent are estimated by multiplying the total organic content of the discharged wastewater effluent by an emission factor associated with the discharge:

Equation 7-25: CH₄ Emissions from Industrial Wastewater Treatment Discharge

 $CH_4 Effluent_{IND} = TOW_{EFFLUENT,IND} \times EF_{EFFLUENT}$

where,

CH₄ Effluent_{IND} = CH₄ emissions from industrial wastewater discharge for inventory year (kg CH₄/year)

^b Remaining onsite treated in other treatment assumed to be non-emissive and not shown here.

TOW_{EFFLUENT,IND} = Total organically degradable material in wastewater effluent from industry for inventory

year (kg COD/year or kg BOD/year)

EF_{EFFLUENT} = Tier 1 emission factor for wastewater discharged to aquatic environments (0.028 kg

CH₄/kg COD or 0.068 kg CH₄/kg BOD) (IPCC 2019)

The COD or BOD in industrial treated effluent (TOW_{EFFLUENT,IND}) was determined by multiplying the total organics in the industry's untreated wastewater that is treated on site by an industry-specific percent removal where available or a more general percent removal based on biological treatment for other industries. Table 7-22 presents the percent of wastewater treated onsite, while Table 7-24 presents the fraction of TOW removed during treatment.

Equation 7-26: TOW in Industrial Wastewater Effluent

 $TOW_{EFFLUENT,IND} = TOW_{IND} \times \% \text{ onsite } \times (1 - TOW_{REM})$

where,

TOW_{EFFLUENT,IND} = Total organically degradable material in wastewater effluent from industry for inventory

year (kg COD/year or kg BOD/year)

TOW_{IND} = Total organics in untreated wastewater for industry for inventory year (kg COD/year)

%onsite = Percent of industry wastewater treated on site (%)
TOW_{REM} = Fraction of organics removed during treatment

Table 7-24: Fraction of TOW Removed During Treatment by Industry

Industry	TOW _{REM}	Source
Pulp, Paper, and Paperboard	0.91	Malmberg (2018)
Red Meat and Poultry	0.85	IPCC (2019), Table 6.6b
Fruits and Vegetables	0.85	IPCC (2019), Table 6.6b
Ethanol Production		
Biomethanator Treatment	0.90	ERG (2008a), ERG (2006b)
Other Treatment	0.85	IPCC (2019), Table 6.6b
Petroleum Refining	0.93	Kenari, Sarrafzadeh, and Tavakoli (2010)
Breweries	0.85	IPCC (2019), Table 6.6b

Discussion of Industry-Specific Data:

Pulp, Paper, and Paperboard Manufacturing Wastewater Treatment. Wastewater treatment for the pulp, paper, and paperboard manufacturing (hereinafter referred to as "pulp and paper") industry typically includes neutralization, screening, sedimentation, and flotation/hydrocycloning to remove solids (World Bank 1999; Nemerow and Dasgupta 1991). Secondary treatment (storage, settling, and biological treatment) mainly consists of lagooning. About 60 percent of pulp and paper mills have on-site treatment with primary treatment and about half of these also have secondary treatment (ERG 2008). In the United States, primary treatment is focused on solids removal, equalization, neutralization, and color reduction (EPA 1993b). The vast majority of pulp and paper mills with on-site treatment systems use mechanical clarifiers to remove suspended solids from the wastewater. About 10 percent of pulp and paper mills with treatment systems use settling ponds for primary treatment and these are more likely to be located at mills that do not perform secondary treatment (EPA 1993b).

Approximately 42 percent of the BOD passes on to secondary treatment, which consists of activated sludge, aerated stabilization basins, or non-aerated stabilization basins. Pulp and paper mill wastewater treated using anaerobic ponds or lagoons or unaerated ponds were classified as anaerobic (with an MCF of 0.8). Wastewater flow treated in systems with aerated stabilization basins or facultative lagoons was classified as partially anaerobic (with an MCF of 0.2, which is the 2006 IPCC Guidelines-suggested MCF for shallow lagoons). Wastewater flow treated in systems with activated sludge systems or similarly aerated biological systems was classified as aerobic.

A time series of CH₄ emissions for 1990 through 2021 was developed based on paper and paperboard production data and market pulp production data. Market pulp production values were available directly for 1998, 2000 through 2003, and 2010 through 2020. Where market pulp data were unavailable, a percent of woodpulp that is market pulp was applied to woodpulp production values from FAOSTAT to estimate market pulp production (FAO 2022a). The percent of woodpulp that is market pulp for 1990 to 1997 was assumed to be the same as 1998, 1999 was interpolated between values for 1998 and 2000, 2000 through 2009 were interpolated between values for 2003 and 2010, and 2021 was forecasted from the rest of the time series. A time series of the overall wastewater outflow in units of cubic meters of wastewater per ton of total production (i.e., market pulp plus woodpulp) is presented in Table 7-25. Data for 1990 through 1994 varies based on data outlined in ERG (2013a) to reflect historical wastewater flow. Wastewater generation rates for 1995, 2000, and 2002 were estimated from the 2014 American Forest and Paper Association (AF&PA) Sustainability Report (AF&PA 2014). Wastewater generation rates for 2004, 2006, 2008, 2010, 2012, and 2014 were estimated from the 2016 AF&PA Sustainability Report (AF&PA 2016). Data for 2005 and 2016 were obtained from the 2018 AF&PA Sustainability Report (AF&PA 2018), data for 2018 were obtained from the 2020 AF&PA Sustainability Report (AF&PA 2020), and data for 2020 were obtained from a 2022 AF&PA sustainability update (AF&PA 2022). Data for intervening years were obtained by linear interpolation, while 2021 was set equal to 2020. The average BOD concentration in raw wastewater was estimated to be 0.4 grams BOD/liter for 1990 to 1998, while 0.3 grams BOD/liter was estimated for 2014 through 2021 (EPA 1997b; EPA 1993b; World Bank 1999; Malmberg 2018). Data for intervening years were obtained by linear interpolation.

Table 7-25: Wastewater Outflow (m³/ton) for Pulp, Paper, and Paperboard Mills

Year	Wastewater Outflow (m³/ton)
1990	68
2005	43
2017	39
2018	40
2019	39
2020	39
2021	39

Sources: ERG (2013a), AF&PA (2014), AF&PA (2016), AF&PA (2018), AF&PA

(2020); AF&PA (2022)

Pulp, Paper, and Paperboard Wastewater Treatment Effluent. Methane emissions from pulp, paper, and paperboard wastewater treatment effluent were estimated by multiplying the total BOD of the discharged wastewater effluent by an emission factor associated with the location of the discharge.

Equation 7-27: Emissions from Pulp and Paper Discharge (U.S. Specific)

$$\begin{split} \textit{Emissions from Pulp and Paper Discharge} &\; \left(\text{U. S. Specific,} \frac{kt \; \text{CH}_4}{\text{year}}\right) \\ &= \left(\text{TOW}_{\text{RLE,pulp}} \times \text{EF}_{\text{RLE}}\right) + \left(\text{TOW}_{\text{Other,pulp}} \times \text{EF}_{\text{Other}}\right) \end{split}$$

Equation 7-28: Total Organics in Pulp and Paper Effluent Discharged to Reservoirs, Lakes, Or **Estuaries (U.S. Specific)**

$$TOW_{RLE,pulp} (\frac{Gg \, BOD}{year}) \, = \, TOW_{EFFLUENT,IND} \, \times \, Percent_{RLE,pulp}$$

Equation 7-29: Total Organics in Pulp and Paper Effluent Discharged to Other Waterbodies (U.S. Specific)

$$\text{TOW}_{\text{Other,pulp}} \; (\frac{\text{Gg BOD}}{\text{year}}) \; = \; \text{TOW}_{\text{EFFLUENT,IND}} \; \times \; \text{Percent}_{\text{Other,pulp}}$$

where,

TOW_{RLE,pulp} = Total organics in pulp, paper, and paperboard manufacturing wastewater treatment effluent discharged to reservoirs, lakes, or estuaries (Gg BOD/year)

EF_{RLE} = Emission factor (discharge to reservoirs/lakes/estuaries) (0.114 kg CH₄/kg BOD) (IPCC

2019)

TOW_{Other,pulp} = Total organics in pulp, paper, and paperboard manufacturing wastewater treatment

effluent discharged to other waterbodies (Gg BOD/year)

EFother = Emission factor (discharge to other waterbodies) (0.021 kg CH₄/kg BOD) (IPCC 2019) TOW_{EFFLUENT,IND} = Total organically degradable material in pulp, paper, and paperboard manufacturing

wastewater effluent for inventory year (Gg BOD/year)

Percent_{RLE,pulp} = Percent of wastewater effluent discharged to reservoirs, lakes, and estuaries (ERG

2021b)

Percentother,pulp = Percent of wastewater effluent discharged to other waterbodies (ERG 2021b)

The percent of pulp, paper, and paperboard wastewater treatment effluent routed to reservoirs, lakes, or estuaries (3 percent) and other waterbodies (97 percent) were obtained from discussions with NCASI (ERG 2021b). Data for 2019 were assumed the same as the rest of the time series due to lack of available data. Default emission factors for reservoirs, lakes, and estuaries (0.114 kg CH₄/kg BOD) and other waterbodies (0.021 kg CH₄/kg BOD) were obtained from IPCC (2019).

Meat and Poultry Processing. The meat and poultry processing industry makes extensive use of anaerobic lagoons in sequence with screening, fat traps, and dissolved air flotation when treating wastewater on site. Although all meat and poultry processing facilities conduct some sort of treatment on site, about 33 percent of meat processing operations (EPA 2002) and 25 percent of poultry processing operations (U.S. Poultry 2006) perform on-site treatment in anaerobic lagoons. The IPCC default emission factor of 0.2 kg CH₄/kg COD for anaerobic lagoons were used to estimate the CH₄ produced from these on-site treatment systems.

Vegetables, Fruits, and Juices Processing. Treatment of wastewater from fruits, vegetables, and juices processing includes screening, coagulation/settling, and biological treatment (lagooning). The flows are frequently seasonal, and robust treatment systems are preferred for on-site treatment. About half of the operations that treat and discharge wastewater use lagoons intended for aerobic operation, but the large seasonal loadings may develop limited anaerobic zones. In addition, some anaerobic lagoons may also be used (Nemerow and Dasgupta 1991). Wastewater treated in partially anaerobic systems were assigned the IPCC default emission factor of 0.12 kg CH₄/kg BOD. Outflow and BOD data, presented in Table 7-26, were obtained from CAST (1995) for apples, apricots, asparagus, broccoli, carrots, cauliflower, cucumbers (for pickles), green peas, pineapples, snap beans, and spinach; EPA (1974) for potato and citrus fruit processing; and EPA (1975) for all other commodities.

Table 7-26: Wastewater Outflow (m³/ton) and BOD Production (g/L) for U.S. Vegetables, Fruits, and Juices Production

Wastewater Outflow (m³/ton)	Organic Content in Untreated Wastewater (g BOD/L)
10.27	1.765
9.85	0.751
9.08	8.16
10.11	0.317
	(m³/ton) 10.27 9.85 9.08

Commodity	Wastewater Outflow (m³/ton)	Organic Content in Untreated Wastewater (g BOD/L)
Non-citrus Fruits	12.59	1.226
Grapes (for wine)	2.78	1.831

Sources: CAST (1995); EPA (1974); EPA (1975).

Ethanol Production. Ethanol, or ethyl alcohol, is produced primarily for use as a fuel component, but is also used in industrial applications and in the manufacture of beverage alcohol. Ethanol can be produced from the fermentation of sugar-based feedstocks (e.g., molasses and beets), starch- or grain-based feedstocks (e.g., corn, sorghum, and beverage waste), and cellulosic biomass feedstocks (e.g., agricultural wastes, wood, and bagasse). Ethanol can also be produced synthetically from ethylene or hydrogen and carbon monoxide. However, synthetic ethanol comprises a very small percent of ethanol production in the United States. Currently, ethanol is mostly made from sugar and starch crops, but with advances in technology, cellulosic biomass is increasingly used as ethanol feedstock (DOE 2013).

Ethanol is produced from corn (or other sugar or starch-based feedstocks) primarily by two methods: wet milling and dry milling. Historically, the majority of ethanol was produced by the wet milling process, but now the majority is produced by the dry milling process. The dry milling process is cheaper to implement and is more efficient in terms of actual ethanol production (Rendleman and Shapouri 2007). The wastewater generated at ethanol production facilities is handled in a variety of ways. Dry milling facilities often combine the resulting evaporator condensate with other process wastewaters, such as equipment wash water, scrubber water, and boiler blowdown and anaerobically treat this wastewater using various types of digesters. Wet milling facilities often treat their steepwater condensate in anaerobic systems followed by aerobic polishing systems. Wet milling facilities may treat the stillage (or processed stillage) from the ethanol fermentation/distillation process separately or together with steepwater and/or wash water. Methane generated in anaerobic sludge digesters is commonly collected and either flared or used as fuel in the ethanol production process (ERG 2006b).

About 33 percent of wet milling facilities and 75 percent of dry milling facilities treat their wastewater anaerobically. A default emission factor of 0.2 kg CH₄/kg COD for anaerobic treatment was used to estimate the CH₄ produced from these on-site treatment systems. The amount of CH₄ recovered through the use of biomethanators was estimated, and a 99 percent destruction efficiency was used. Biomethanators are anaerobic reactors that use microorganisms under anaerobic conditions to reduce COD and organic acids and recover biogas from wastewater (ERG 2006b). For facilities using biomethanators, approximately 90 percent of BOD is removed during on-site treatment (ERG 2006b, 2008a). For all other facilities, the removal of organics was assumed to be equivalent to secondary treatment systems, or 85 percent (IPCC 2019).

Petroleum Refining. Petroleum refining wastewater treatment operations have the potential to produce CH₄ emissions from anaerobic wastewater treatment. EPA's Office of Air and Radiation performed an Information Collection Request (ICR) for petroleum refineries in 2011. ¹¹ Facilities that reported using non-aerated surface impoundments or other biological treatment units (trickling filter, rotating biological contactor), which have the potential to lead to anaerobic conditions, were assigned the IPCC default emission factor of 0.05 kg CH₄/kg COD. In addition, the wastewater generation rate was determined to be 26.4 gallons per barrel of finished product, or 0.8 m³/ton (ERG 2013b).

Breweries. Since 2010, the number of breweries has increased from less than 2,000 to more than 8,000 (Brewers Association 2021). This increase has primarily been driven by craft breweries, which have increased by over 250 percent during that period. Craft breweries were defined as breweries producing less than six million barrels of

¹¹ Available online at https://www.epa.gov/stationary-sources-air-pollution/comprehensive-data-collected-petroleum-refining-sector.

beer per year, and non-craft breweries produce greater than six million barrels. With their large amount of water use and high strength wastewater, breweries generate considerable CH₄ emissions from anaerobic wastewater treatment. However, because many breweries recover their CH₄, their emissions are much lower.

The Alcohol and Tobacco Tax and Trade Bureau (TTB) provides total beer production in barrels per year for different facility size categories from 2007 to the present (TTB 2022). For years prior to 2007 where TTB data were not readily available, the Brewers Almanac (Beer Institute 2011) was used, along with an estimated percent of craft and non-craft breweries based on the breakdown of craft and non-craft for the years 2007 through 2020.

To determine the overall amount of wastewater produced, data on water use per unit of production and a wastewater-to-water ratio were used from the Benchmarking Report (Brewers Association 2016a) for both craft and non-craft breweries. Since brewing is a batch process, and different operations have varying organic loads, full-strength brewery wastewater can vary widely on a day-to-day basis. However, the organic content of brewery wastewater does not substantially change between craft and non-craft breweries. Some breweries may collect and discharge high strength wastewater from particular brewing processes (known as "side streaming") to a POTW, greatly reducing the organics content of the wastewater that is treated on site. Subsequently, the MCF for discharge to a POTW was assumed to be zero (ERG 2018b).

Breweries may treat some or all of their wastewater on site prior to discharge to a POTW or receiving water. Onsite treatment operations can include physical treatment (e.g., screening, settling) which are not expected to contribute to CH₄ emissions, or biological treatment, which may include aerobic treatment or pretreatment in anaerobic reactors (ERG 2018b). The IPCC default emission factor of 0.2 kg CH₄/kg COD for anaerobic treatment and 0 for aerobic treatment were used to estimate the CH₄ produced from these on-site treatment systems (IPCC 2006). The amount of CH₄ recovered through anaerobic wastewater treatment was estimated, and a 99 percent destruction efficiency was used (ERG 2018b; Stier J. 2018). Very limited activity data are available on the number of U.S. breweries that are performing side streaming or pretreatment of wastewater prior to discharge.

Domestic Wastewater N2O Emission Estimates

Domestic wastewater N₂O emissions originate from both septic systems and POTWs. Within these centralized systems, N₂O emissions can result from aerobic systems, including systems like constructed wetlands. Emissions will also result from discharge of centrally treated wastewater to waterbodies with nutrient-impacted/eutrophic conditions. The systems with emission estimates are:

- Septic systems (A);
- Centralized treatment aerobic systems (B), including aerobic systems (other than constructed wetlands) (B1), constructed wetlands only (B2), and constructed wetlands used as tertiary treatment (B3);
- Centralized anaerobic systems (C); and
- Centralized wastewater treatment effluent (D).

Methodological equations for each of these systems are presented in the subsequent subsections; total domestic N_2O emissions are estimated as follows:

Equation 7-30: Total Domestic N₂O Emissions from Wastewater Treatment and Discharge

Total Domestic N_2O Emissions from Wastewater Treatment and Discharge (kt) = A + B + C + D

Table 7-27 presents domestic wastewater N₂O emissions for both septic and centralized systems, including emissions from centralized wastewater treatment effluent, in 2021.

Table 7-27: Domestic Wastewater N₂O Emissions from Septic and Centralized Systems (2021, kt, MMT CO₂ Eq. and Percent)

	N ₂ O Emissions (kt)	N ₂ O Emissions (MMT CO ₂ Eq.)	% of Domestic Wastewater N ₂ O
Septic Systems	3	0.8	3.8

		N ₂ O Emissions	% of Domestic
	N ₂ O Emissions (kt)	(MMT CO ₂ Eq.)	Wastewater N ₂ O
Centrally-Treated Aerobic Systems	58	15.4	75.5
Centrally-Treated Anaerobic Systems	+	+	+
Centrally-Treated Wastewater Effluent	16	4.2	20.7
Total	77	20.4	100

⁺ Does not exceed 0.5 kt or 0.05 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Emissions from Septic Systems:

Nitrous oxide emissions from domestic treatment depend on the nitrogen present, in this case, in the form of protein. Per capita protein consumption (kg protein/person/year) was determined by multiplying per capita annual food availability data and its protein content. Those data are then adjusted using a factor to account for the fraction of protein actually consumed. The methodological equations are:

Equation 7-31: Annual per Capita Protein Supply (U.S. Specific)

 $Protein_{SUPPLY}$ (kg/person/year) = $Protein_{per\ capita}/1000 \times 365.25$

Equation 7-32: Consumed Protein [IPCC 2019 (Eq. 6.10A)]

Protein (kg/person/year) = Protein_{SUPPLY} \times FPC

Table 7-28: Variables and Data Sources for Protein Consumed

Variable	Variable Description	Units	Inventory Years: Source of Value
Protein			
Protein _{SUPPLY}	Annual per capita protein supply ^a	kg/person/year	1990-2021: Calculated
Protein _{per capita}	Daily per capita protein supply ^a	g/person/day	1990-2021: USDA (2021)
1000	Conversion factor	g to kg	Standard conversion
365.25	Conversion factor	Days in a year	Standard conversion
FPC	Fraction of Protein Consumed ^a	kg protein consumed / kg protein available	1990-2010: USDA (2021) 2011-2019: FAO (2022c) and scaling factor 2020-2021: Forecasted from the rest of the time series

^a Value of this activity data varies over the Inventory time series.

Nitrous oxide emissions from septic systems were estimated by multiplying the U.S. population by the percent of wastewater treated in septic systems (about 17 percent in 2021; U.S. Census Bureau 2019), consumed protein per capita (kg protein/person/year), the fraction of N in protein, the correction factor for additional nitrogen from household products, the factor for industrial and commercial co-discharged protein into septic systems, the factor for non-consumed protein added to wastewater and an emission factor and then converting the result to kt/year. All factors obtained from IPCC (2019).

U.S. population data were taken from historic U.S. Census Bureau national population totals data and include the populations of the United States and Puerto Rico (U.S. Census Bureau 2002; U.S. Census Bureau 2011; U.S. Census Bureau 2021a and 2021b, Instituto de Estadísticas de Puerto Rico 2021). Population data for American Samoa, Guam, Northern Mariana Islands, and the U.S. Virgin Islands were taken from the U.S. Census Bureau International Database (U.S. Census Bureau 2022). Table 7-12 presents the total U.S. population for 1990 through 2021. The fraction of the U.S. population using septic systems, as well as centralized treatment systems (see below), is based on data from *American Housing Survey* (U.S. Census Bureau 2019). The methodological equations are:

Equation 7-33: Total Nitrogen Entering Septic Systems (IPCC 2019 [Eq. 6.10])

$$TN_{DOM_{SEPTIC}} \left(\frac{kg N}{year} \right)$$

= $(US_{POP} \times T_{SEPTIC}) \times Protein \times F_{NPR} \times N_{HH} \times F_{NON-CON_septic} \times F_{IND-COM_septic}$

Equation 7-34: Emissions from Septic Systems (IPCC 2019 [Eq. 6.9])

$$A\left(\frac{kt N_2 O}{vear}\right) = TN_{DOM_SEPTIC} \times (EF_{SEPTIC}) \times 44/28 \times 1/10^6$$

Table 7-29: Variables and Data Sources for N₂O Emissions from Septic System

			Inventory Years: Source of		
Variable	Variable Description	Units	Value		
Emissions from Septic Systems					
TN _{DOM_SEPTIC}	Total nitrogen entering septic systems	kg N/year	1990-2021: Calculated		
US _{POP}	U.S. population ^a	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau 2002; Instituto de Estadísticas de Puerto Rico 2021 2000-2009: U.S. Census Bureau 2011 2010-2019: U.S. Census Bureau (2021a) 2020-2021: U.S. Census Bureau (2021b) U.S. Territories other than Puerto Rico: 1990-2021: U.S. Census Bureau (2022)		
Тѕертіс	Percent treated in septic systems ^a	%	Odd years from 1989 through 2019: U.S. Census Bureau (2019) Data for intervening years obtained by linear interpolation 2020-2021: Forecasted from the rest of the time series		
		kg N/kg	1990-2021: IPCC (2019) Eq.		
F _{NPR}	Fraction of nitrogen in protein (0.16)	protein	6.10		
N_{HH}	Additional nitrogen from household products (1.17)	No units	1990-2021: IPCC (2019) Table		
F _{NON-CON_septic}	Factor for Non-Consumed Protein Added to Wastewater (1.13)	No units	6.10a		
F _{IND-COM_septic}	Factor for Industrial and Commercial Co-Discharged Protein, septic systems (1)	No units	1990-2021: IPCC (2019)		
EF _{SEPTIC}	Emission factor, septic systems (0.0045)	kg N ₂ O-N/kg N	1990-2021: IPCC (2019) Table 6.8a		
44/28	Conversion factor	Molecular weight ratio of N ₂ O to N ₂	Standard conversion		
1/106	Conversion factor	kg to kt	Standard conversion		
Value of this activ	vity data varies over the Inventory time series.	. 			

^a Value of this activity data varies over the Inventory time series.

Emissions from Centrally Treated Aerobic and Anaerobic Systems:

Nitrous oxide emissions from POTWs depend on the total nitrogen entering centralized wastewater treatment. The total nitrogen entering centralized wastewater treatment was estimated by multiplying the U.S. population by the percent of wastewater collected for centralized treatment (about 83 percent in 2021), the consumed protein per capita, the fraction of N in protein, the correction factor for additional N from household products, the factor for industrial and commercial co-discharged protein into wastewater treatment, and the factor for non-consumed protein added to wastewater.

Equation 7-35: Total Nitrogen Entering Centralized Systems (IPCC 2019 [Eq. 10])

$$\begin{split} & TN_{DOM_{CENTRAL}} \left(\frac{kg \ N}{year}\right) \\ = & (US_{POP} \times T_{CENTRALIZED}) \times Protein \times F_{NPR} \times N_{HH} \times F_{NON-CON} \times F_{IND-COM} \end{split}$$

Table 7-30: Variables and Data Sources for Non-Consumed Protein and Nitrogen Entering Centralized Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
US _{POP}	U.S. population ^a	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau (2002); Instituto de Estadísticas de Puerto Rico (2021) 2000-2009: U.S. Census Bureau 2011 2010-2019: U.S. Census Bureau (2021a) 2020-2021: U.S. Census Bureau (2021b) U.S. Territories other than Puerto Rico: 1990-2021: U.S. Census Bureau (2022)
T _{CENTRALIZED}	Percent collected ^a	%	Odd years from 1989 through 2019: U.S. Census Bureau (2019) Data for intervening years obtained by linear interpolation 2020-2021: Forecasted from the rest of the time series
Protein	Consumed protein per capita ^a	kg/person/year	1990-2021: Calculated
F _{NPR}	Fraction of nitrogen in protein (0.16)	kg N/kg protein	1990-2021: IPCC (2019), Eq. 6.10
N _{HH} F _{NON-CON}	Factor for additional nitrogen from household products (1.17) Factor for U.S. specific non-consumed protein (1.13) Factor for Industrial and Commercial Co-	No units No units	1990-2021: IPCC (2019), Table 6.10a
F _{IND-COM}	Discharged Protein (1.25)	No units	Table 6.11

^a Value of this activity data varies over the Inventory time series.

Nitrous oxide emissions from POTWs were estimated by multiplying the total nitrogen entering centralized wastewater treatment, the relative percentage of wastewater treated by aerobic systems (other than constructed wetlands) and anaerobic systems, aerobic systems with constructed wetlands as the sole treatment, the emission factor for aerobic systems and anaerobic systems, and the conversion from N_2 to N_2O .

Table 7-34 presents the data for U.S. population, population served by centralized wastewater treatment plants, available protein, and protein consumed. The methodological equations are:

Equation 7-36: Total Domestic N₂O Emissions from Centrally Treated Aerobic Systems

Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands) (B1) + Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only) (B2) + Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment) (B3) = $B(kt N_2 O/year)$

where,

Equation 7-37: Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands) (IPCC 2019 [Eq. 6.9])

B1 (kt N₂O/year) = $[(TN_{DOM_CENTRAL}) \times (\% aerobic_{OTCW})] \times EF_{aerobic} \times 44/28 \times 1/10^6$

Table 7-31: Variables and Data Sources for N₂O Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands)

Variable Emissions from Cent	Variable Description rally Treated Aerobic Systems (Other than Constructed	Units Wetlands) (kt N₂C	Inventory Years: Source of Value
TN _{DOM_CENTRAL}	Total nitrogen entering centralized systems ^a	kg N/year	1990-2021: Calculated
% aerobic _{otcw}	Flow to aerobic systems, other than constructed wetlands only / total flow to POTWs ^a	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, 2004), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
EF _{aerobic}	U.Sspecific emission factor – aerobic systems (0.015)	kg N ₂ O-N/kg N	1990-2021: IPCC (2022)
44/28	Conversion factor	Molecular weight ratio of N ₂ O to N ₂	Standard conversion
1/106	Conversion factor	kg to kt	Standard conversion

^a Value of this activity data varies over the Inventory time series.

Nitrous oxide emissions from constructed wetlands used as sole treatment include similar data and processes as aerobic systems other than constructed wetlands. See description above. Nitrous oxide emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow to constructed wetlands used as tertiary treatment, wastewater N concentration entering tertiary treatment, constructed wetlands emission factor, and converting to kt/year.

Equation 7-38: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only) (IPCC 2014 [Eq. 6.9])

B2
$$\left(\frac{\text{kt N}_2\text{O}}{\text{vear}}\right) = \left[\left(\text{TN}_{\text{DOM_CENTRAL}}\right) \times \left(\% \text{ aerobic}_{\text{CW}}\right)\right] \times \text{EF}_{\text{CW}} \times 44/28 \times 1/10^6$$

Equation 7-39: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment) (U.S.-Specific)

B3 (
$$\frac{\text{kt N}_2\text{O}}{\text{year}}$$
) = [(POTW_flow_CW) × (N_{CW,INF}) × 3.785 × (EF_{CW})] × 1/10⁶ × 365.25

Table 7-32: Variables and Data Sources for N₂O Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands)

			Inventory Years: Source of		
Variable	Variable Description	Units	Value		
Emissions from Constructed Wetlands Only (kt N ₂ O/year)					
TN _{DOM_CENTRAL}	Total nitrogen entering centralized treatment ^a	kg N/year	1990-2021: Calculated		
% aerobic _{cw}	Flow to aerobic systems, constructed wetlands used as sole treatment / total flow to POTWs ^a	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series		
EF _{CW}	Emission factor for constructed wetlands (0.0013)	kg N₂O-N/kg N	1990-2021: IPCC (2014) Table 6.7		
44/28	Conversion factor	Molecular weight ratio of N ₂ O to N ₂	Standard conversion		
1/106	Conversion factor	kg to kt	Standard conversion		
Emissions from Consti	ructed Wetlands used as Tertiary Treatment (kt N₂O,	/year)			
POTW_flow_CW	Wastewater flow to POTWs that use constructed wetlands as tertiary treatment ^a	MGD	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation.		

			Inventory Years: Source of
Variable	Variable Description	Units	Value
			2013-2021: Forecasted
			from the rest of the time
			series
N.	BOD concentration in wastewater entering the	mg/L	1990-2021: Metcalf & Eddy
N _{CW,INF}	constructed wetland (25)		(2014)
3.785	Conversion factor	liters to gallons	Standard conversion
CC	Emission factor for constructed wetlands	kg N₂O-N/kg N	1990-2021: IPCC (2014)
EF _{CW}	(0.0013)	kg IN ₂ O-IN/ kg IN	Table 6.7
1/106	Conversion factor	mg to kg	Standard conversion
365.25	Conversion factor	Days in a year	Standard conversion

^a Value of this activity data varies over the Inventory time series.

Data sources and methodologies are similar to those described for aerobic systems, other than constructed wetlands. See discussion above.

Equation 7-40: Emissions from Centrally Treated Anaerobic Systems (IPCC 2019 [Eq. 6.9])

$$(\frac{\text{kt N}_2 \text{O}}{\text{vear}}) = [(\text{TN}_{\text{DOM_CENTRAL}}) \times (\% \text{ anaerobic})] \times \text{EF}_{\text{anaerobic}} \times 44/28 \times 1/10^6$$

Table 7-33: Variables and Data Sources for N₂O Emissions from Centrally Treated Anaerobic Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Centrally Trea	ted Anaerobic Systems		
TN _{DOM_CENTRAL}	Total nitrogen entering centralized treatment ^a	kg N/year	1990-2021: Calculated
% anaerobic	Percent centralized wastewater that is anaerobically treated ^a	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: (EPA 1992, 1996, 2000, 2004), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
EF _{anaerobic}	Emission factor for anaerobic reactors/deep lagoons (0)	kg N₂O-N/kg N	1990-2021: IPCC (2019) Table 6.8A
44/28	Conversion factor	Molecular weight ratio of N ₂ O to N ₂	Standard conversion
1/10 ⁶	Conversion factor	mg to kg	Standard conversion

^a Value of this activity data varies over the Inventory time series.

Table 7-34: U.S. Population (Millions) Fraction of Population Served by Centralized Wastewater Treatment (percent), Protein Supply (kg/person-year), and Protein Consumed (kg/person-year)

		Centralized WWT		
Year	Population	Population (%)	Protein Supply	Protein Consumed
1990	253	75.6	43.1	33.2
2005	300	78.8	44.9	34.7

2017	329	82.1	44.7	34.5
2018	330	82.9	45.5	35.1
2019	332	83.6	45.4	35.0
2020	335	82.7	44.6	34.4
2021	336	83.0	44.6	34.4

Sources: Population – U.S. Census Bureau 2002; U.S. Census Bureau 2011; U.S. Census Bureau (2021a and 2021b); Instituto de Estadísticas de Puerto Rico (2021); U.S. Census Bureau (2022); WWTP Population – U.S. Census Bureau (2019); Available Protein – USDA (2021), FAO (2022c); Protein Consumed – FAO (2022c).

Emissions from Discharge of Centralized Treatment Effluent:

Nitrous oxide emissions from the discharge of wastewater treatment effluent were estimated by multiplying the total nitrogen in centrally treated wastewater effluent by the percent of wastewater treated in primary, secondary, and tertiary treatment and the fraction of nitrogen remaining after primary, secondary, or tertiary treatment and then multiplying by the percent of wastewater volume routed to waterbodies with nutrient-impaired/eutrophic conditions and all other waterbodies (ERG 2021a) and emission factors for discharge to impaired waterbodies and other waterbodies from IPCC (2019). The methodological equations are:

Equation 7-41: Emissions from Centrally Treated Systems Discharge (U.S.-Specific)

$$D\left(\frac{\operatorname{kt} N_2 0}{\operatorname{year}}\right) = \left[\left(N_{\text{EFFLUENT,IMP}} \times \operatorname{EF}_{\text{IMP}}\right) + \left(N_{\text{EFFLUENT,NONIMP}} \times \operatorname{EF}_{\text{NONIMP}}\right)\right] \times 44/28 \times 1/10^6$$

where

Equation 7-42: Total Organics in Centralized Treatment Effluent (IPCC 2019 [Eq. 6.8])

$$N_{EFFLUENT,DOM} \ \left(\frac{\text{kg N}}{\text{year}} \right)$$

=
$$[TN_{DOM_CENTRAL}^{12} \times \%$$
 primary $\times (1 - N_{rem,PRIMARY})] + [TN_{DOM_CENTRAL} \times \%$ secondary $\times (1 - N_{rem,SECONDARY})] + [TN_{DOM_CENTRAL} \times \%$ tertiary $\times (1 - N_{rem,TERTIARY})]$

Equation 7-43: Total Nitrogen in Effluent Discharged to Impaired Waterbodies (U.S.-Specific)

$$N_{EFFLUENT.IMP}$$
 (kg N/year) = $(N_{EFFLUENT.DOM} \times Percent_{IMP})/1000$

Equation 7-44: Total Nitrogen in Effluent Discharged to Nonimpaired Waterbodies (U.S.-Specific)

$$N_{EFFLUENT,NONIMP}$$
 (kg N year) = $N_{EFFLUENT,DOM} \times Percent_{NONIMP}$)/1000

Table 7-35: Variables and Data Sources for N₂O Emissions from Centrally Treated Systems Discharge

Variable	Variable Description	Units	Source of Value
N _{EFFULENT,DOM}	Total organics in centralized treatment effluent ^a	kg N/year	1990-2021: Calculated
		Molecular	
44/28	Conversion factor	weight ratio of	Standard conversion
		N ₂ O to N ₂	
1/106	Conversion factor	kg to kt	Standard conversion
TN _{DOM_CENTRAL}	Total nitrogen entering centralized treatment ^a	kg N/year	1990-2021: Calculated
1000	Conversion factor	kg to kt	Standard Conversion

¹² See emissions from centrally treated aerobic and anaerobic systems for methodological equation calculating TN_{DOM CENTRAL}.

Variable	Variable Description	Units	Source of Value
% primary	Percent of primary domestic centralized treatment ^a	%	1990,1991: Set equal to
% secondary	Percent of secondary domestic centralized treatment ^a	%	1992.
% tertiary	Percent of tertiary domestic centralized treatment ^a	%	1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012), respectively Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series
N _{rem,PRIMARY}	Fraction of nitrogen removed from primary domestic centralized treatment (0.1)	No units	
N _{rem} ,SECONDARY	Fraction of nitrogen removed from secondary domestic centralized treatment (0.4)	No units	1990-2021: IPCC (2019) Table 6.10c
N _{rem,TERTIARY}	Fraction of nitrogen removed from tertiary domestic centralized treatment (0.9)	No units	
N _{EFFLUENT,IMP}	Total nitrogen in effluent discharged to impaired waterbodies	kg N/year	
N _{EFFLUENT} ,NONIMP	Total nitrogen in effluent discharged to nonimpaired waterbodies	kg N/year	1990-2021: Calculated
EF _{IMP}	Emission factor (discharge to impaired waterbodies) (0.19)	kg N₂O-N/kg N	1000 2021 (DCC /2010)
EF _{NONIMPr}	Emissions factor (discharge to nonimpaired waterbodies) (0.005)	kg N₂O-N/kg N	1990-2021: IPCC (2019) Table 6.8a
Percent _{IMP}	Percent of wastewater discharged to impaired waterbodies ^a	%	1990-2010: Set equal to
Percent _{NONIMP}	Percent of wastewater discharged to nonimpaired waterbodies ^a	%	2010 2010: ERG (2021a) 2011: Obtained by linear interpolation 2012: ERG (2021a) 2013-2021: Set equal to 2012

^a Value for this activity data varies over the Inventory time series.

Industrial Wastewater N2O Emission Estimates

Nitrous oxide emission estimates from industrial wastewater are estimated according to the methodology described in the 2019 Refinement. U.S. industry categories that are likely to produce significant N₂O emissions from wastewater treatment were identified based on whether they generate high volumes of wastewater, whether there is a high nitrogen wastewater load, and whether the wastewater is treated using methods that result in N₂O emissions. The top four industries that meet these criteria and were added to the inventory are meat and poultry processing; petroleum refining; pulp and paper manufacturing; and breweries (ERG 2021a). Wastewater treatment and discharge emissions for these sectors for 2021 are displayed in Table 7-36 below. Table 7-20 contains production data for these industries.

Table 7-36: Total Industrial Wastewater N2O Emissions by Sector (2021, MMT CO2 Eq. and Percent)

Industry	N ₂ O Emissions (MMT CO ₂ Eq.)	% of Industrial Wastewater N ₂ O
Meat & Poultry	0.2	47.7
Petroleum Refineries	0.1	29.8

Total	0.5	100
Breweries	+	0.8
Pulp & Paper	0.1	21.7

⁺ Does not exceed 0.5 MMT CO₂ Eq.

Note: Totals may not sum due to independent rounding.

Emissions from Industrial Wastewater Treatment Systems:

More recent research has revealed that emissions from nitrification or nitrification-denitrification processes at wastewater treatment, previously judged to be a minor source, may in fact result in more substantial emissions (IPCC 2019). N_2O is generated as a by-product of nitrification, or as an intermediate product of denitrification. Therefore, N_2O emissions are primarily expected to occur from aerobic treatment systems. To estimate these emissions, the total nitrogen entering aerobic wastewater treatment for each industry must be calculated. Then, the emission factor provided by the 2019 Refinement is applied to the portion of wastewater that undergoes aerobic treatment.

The total nitrogen that enters each industry's wastewater treatment system is a product of the total amount of industrial product produced, the wastewater generated per unit of product, and the nitrogen expected to be present in each meter cubed of wastewater (IPCC equation 6.13).

Equation 7-45: Total Nitrogen in Industrial Wastewater

$$TN_{INDi} = P_i \times W_i \times TN_i$$

where.

TN_{INDi} = total nitrogen in wastewater for industry *i* for inventory year, kg TN/year

i = industrial sector

P_i = total industrial product for industrial sector *i* for inventory year, t/year

W_i = wastewater generated per unit of production for industrial sector *i* for inventory year,

m³/t product

Tni = total nitrogen in untreated wastewater for industrial sector i for inventory year, kg TN/m³

For the four industries of interest, the total production and the total volume of wastewater generated has already been calculated for CH₄ emissions. For these new N₂O emission estimates, the total nitrogen in the untreated wastewater was determined by multiplying the annual industry production, shown in Table 7-20, by the average wastewater outflow, shown in Table 7-23, and the nitrogen loading in the outflow shown in Table 7-37.

Table 7-37: U.S. Industrial Wastewater Nitrogen Data

Industry	Wastewater Total N (kg N/ m³)	Source for Total N
Pulp and Paper	0.30a	Cabrera (2017)
Meat Processing	0.19	IPCC (2019), Table 6.12
Poultry Processing	0.19	IPCC (2019), Table 6.12
Petroleum Refining	0.051	Kenari et al. (2010)
Breweries – Craft	0.055	IPCC (2019), Table 6.12
Breweries – NonCraft	0.055	IPCC (2019), Table 6.12

^a Units are kilograms N per air-dried metric ton of production.

Nitrous oxide emissions from industry wastewater treatment are calculated by applying an emission factor to the percent of wastewater (and therefore nitrogen) that undergoes aerobic treatment (IPCC Equation 6.11).

Equation 7-46: N₂O Emissions from Industrial Wastewater Treatment Plants

$$N_2O\ Plants_{IND} = \left[\sum_i \left(T_{i,j} \times EF_{i,j} \times TN_{INDi}\right)\right] \times \frac{44}{28}$$

where,

 N_2O Plants_{IND} = N_2O emissions from industrial wastewater treatment plants for inventory year, kg

N₂O/year

 TN_{INDi} = total nitrogen in wastewater from industry *i* for inventory year, kg N/year

 $T_{i,j}$ = degree of utilization of treatment/discharge pathway or system j, for each industry i for

inventory year

i = industrial sector

j = each treatment/discharge pathway or system

EF_{i,i} = emission factor for treatment/discharge pathway or system j, kg N₂O-N/kg N. 0.015 kg

N₂O-N/kg N (IPCC 2022)

44/28 = conversion of kg N_2O-N into kg N_2O

For each industry, the degree of utilization (Ti,j)—the percent of wastewater that undergoes each type of treatment—was previously determined for CH₄ emissions and presented in Table 7-22.

Emissions from Industrial Wastewater Treatment Effluent:

Nitrous oxide emissions from industrial wastewater treatment effluent are estimated by multiplying the total nitrogen content of the discharged wastewater effluent by an emission factor associated with the location of the discharge. Where wastewater is discharged to aquatic environments with nutrient-impacted/eutrophic conditions (i.e., water bodies which are rich in nutrients and very productive in terms of aquatic animal and plant life), or environments where carbon accumulates in sediments such as lakes, reservoirs, and estuaries, the additional organic matter in the discharged wastewater is expected to increase emissions.

Equation 7-47: N₂O Emissions from Industrial Wastewater Treatment Effluent

 $N_2O Effluent_{IND} = N_{EFFLUENT,IND} \times EF_{EFFLUENT} \times 44/28$

where,

 N_2O Effluent_{IND} = N_2O emissions from industrial wastewater discharge for inventory year (kg N_2O /year)

N_{EFFLUENT,IND} = Total nitrogen in industry wastewater effluent discharged to aquatic environments for

inventory year (kg N/year)

EFEFFLUENT = Tier 1 emission factor for wastewater discharged to aquatic environments (0.005 kg

N₂O-N/kg N) (IPCC 2019)

44/28 = Conversion of kg N₂O-N into kg N₂O

The total N in treated effluent was determined through use of a nutrient estimation tool developed by EPA's Office of Water (EPA 2019). The Nutrient Tool uses known nutrient discharge data within defined industrial sectors or subsectors, as reported on Discharge Monitoring Reports, to estimate nutrient discharges for facilities within that sector or subsector that do not have reported nutrient discharges but are likely to discharge nutrients. The estimation considers, within each sector or subsector, elements such as the median nutrient concentration and flow, as well as the percent of facilities within the sector or subsector that have reported discharges. Data from 2018 are available for the pulp, paper, and paperboard, meat and poultry processing, and petroleum refining industries. To complete the time series, an industry-specific percent removal of nitrogen was calculated using the total nitrogen in untreated wastewater. See Table 7-38.

Because data for breweries was not available, the removal of nitrogen was assumed to be equivalent to secondary treatment, or 40 percent (IPCC 2019). The Tier 1 emission factor (0.005 kg N₂O/kg N) from IPCC (2019) was used.

Table 7-38: Industrial Wastewater Nitrogen Discharged in 2018 by Sector (kg N)

		Industry-Specific
Industry	N Effluent _{IND} (kg N)	N Removal Factor
Meat & Poultry	12,078,919	0.082
Petroleum Refineries	1,698,953	0.045
Pulp & Paper	18,809,623	1.08

Breweries ^a	1,604,878	NA
------------------------	-----------	----

^a Nitrogen discharged by breweries was estimated as 60 percent of untreated wastewater nitrogen.

NA (Not Available) Source: ERG (2021a).

Uncertainty

The overall uncertainty associated with both the 2021 CH₄ and N₂O emission estimates from wastewater treatment and discharge was calculated using the 2006 IPCC Guidelines Approach 2 methodology (IPCC 2006). Uncertainty associated with the parameters used to estimate CH₄ emissions include that of numerous input variables used to model emissions from domestic wastewater and emissions from wastewater from pulp and paper manufacturing, meat and poultry processing, fruits and vegetable processing, ethanol production, petroleum refining, and breweries. Uncertainty associated with the parameters used to estimate N₂O emissions include that of numerous input variables used to model emissions from domestic wastewater and emissions from wastewater from pulp and paper manufacturing, meat and poultry processing, petroleum refining, and breweries. Uncertainty associated with centrally treated constructed wetlands parameters including U.S. population served by constructed wetlands, and emission and conversion factors are from IPCC (2014), whereas uncertainty associated with POTW flow to constructed wetlands and influent BOD and nitrogen concentrations were based on expert judgment (ERG 2021b).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 7-39. For 2021, methane emissions from wastewater treatment were estimated to be between 15.1 and 27.8 MMT CO_2 Eq. at the 95 percent confidence level (or in 19 out of 20 Monte Carlo Stochastic Simulations). This indicates a range of approximately 29 percent below to 32 percent above the 2021 emissions estimate of 21.1 MMT CO_2 Eq. Nitrous oxide emissions from wastewater treatment were estimated to be between 13.8 and 61.2 MMT CO_2 Eq., which indicates a range of approximately 34 percent below to 193 percent above the 2021 emissions estimate of 20.9 MMT CO_2 Eq.

Table 7-39: Approach 2 Quantitative Uncertainty Estimates for 2021 Emissions from Wastewater Treatment (MMT CO₂ Eq. and Percent)

C	0	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate					
Source	Gas (MMT CO₂ Eq.)		(MMT	CO ₂ Eq.)	(%)			
			Lower	Upper	Lower	Upper		
			Bound	Bound	Bound	Bound		
Wastewater Treatment	CH ₄	21.1	15.1	27.8	-29%	+32%		
Domestic	CH_4	13.9	9.2	19.7	-34%	+42%		
Industrial	CH_4	7.2	4.2	11.3	-42%	+58%		
Wastewater Treatment	N ₂ O	20.9	13.8	61.2	-34%	+193%		
Domestic	N_2O	20.4	12.8	60.4	-37%	+195%		
Industrial	N_2O	0.5	0.5	1.4	-0.4%	+202%		

^a Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. *Inventory* QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). This effort included a general or Tier 1 analysis, including the following checks:

• Checked for transcription errors in data input;

- Ensured references were specified for all activity data used in the calculations;
- Checked a sample of each emission calculation used for the source category;
- Checked that parameter and emission units were correctly recorded and that appropriate conversion factors were used;
- Checked for temporal consistency in time series input data for each portion of the source category;
- Confirmed that estimates were calculated and reported for all portions of the source category and for all years;
- Investigated data gaps that affected trends of emission estimates; and
- Compared estimates to previous estimates to identify significant changes.

Calculation-related QC (category-specific, Tier 2) was performed for a portion of the domestic wastewater treatment discharges methodology, which included assessing available activity data to ensure the most complete publicly data set was used and checking historical trends in the data to assist determination of best methodology for filling in the time series for data that are not available annually.

All transcription errors identified were corrected and documented. The QA/QC analysis did not reveal any systemic inaccuracies or incorrect input values.

Recalculations Discussion

Population data were updated using the same and latest data sources as the state-level emissions Inventory to create consistency across inventory estimates. These changes affected the entire timeseries, except 2000. Protein data were updated to reflect available protein values available for 2011, 2013, and 2018 through 2020 (FAO 2022c). Pulp, paper, and paperboard production data were updated to reflect revised values for 2020 (FAO 2022a). Pulp, paper, and paperboard wastewater outflow data were updated to reflect new available values for 2020 which affected 2019 and 2020 (AF&PA 2022). Updated red meat production values for 2020, were updated based on revised data (USDA 2022a; USDA 2022c). Fruits and vegetables production values were updated for the time series (ERG 2022). Ethanol production values for 2015 and 2020 were based on revised data (RFA 2022a; RFA 2022b). Petroleum refining production values for 2020 were revised based on EIA (2022). In addition, EPA revised the domestic sludge generation methodology to estimate the sludge generation from U.S. Territories and update the time series to include new 2018 values (ERG 2022).

In addition, for the current Inventory, estimates of CO₂-equivalent total CH₄ and N₂O emissions from wastewater treatment and discharge have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC Fourth Assessment Report (AR4) (IPCC 2007) (used in the previous Inventories). The GWP of CH4 has increased from 25 to 28, leading to an overall increase in CO₂-equivalent CH₄ emissions while the GWP for N₂O decreased from 298 to 265 leading to a decrease in CO₂-equivalent N₂O emissions. The AR5 GWPs have been applied across the entire time series for consistency. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC Fifth Assessment Report can be found in Chapter 9, Recalculation and Improvements.

Compared to the previous Inventory which applied 100-year GWP values from AR4, the cumulative effect of all these recalculations had a minor impact on the overall wastewater treatment emission estimates:

Domestic wastewater treatment and discharge CH4 emissions increased on average 13.9 percent over the timeseries, with the smallest increase of 11.4 percent (1.7 MMT CO₂ Eq.) in 1995 and largest increase of 19.9 percent (2.3 MMT CO₂ Eq.) in 2019.

- Domestic wastewater treatment and discharge N₂O emissions decreased an average 11.0 percent over the timeseries, with the smallest decrease in 8.9 percent (2.0 MMT CO₂ Eq.) in 2019 to the largest decrease of 11.0 percent (2.6 MMT CO₂ Eq.) in 2020.
- Industrial wastewater treatment and discharge CH₄ emissions increased on average 12.1 percent over the timeseries, with the smallest increase of 11.3 percent (0.7 MMT CO₂ Eq.) in 2020 and largest increase of 12.3 percent (0.77 MMT CO₂ Eq.) in 2017.
- Industrial wastewater treatment and discharge N₂O emissions decreased an average 11.1 percent over the timeseries, with the smallest decrease of 11.1 percent (0.04 MMT CO₂ Eq.) in 1991 to the largest decrease of 11.5 percent (0.06 MMT CO₂ Eq.) in 2020.

Over the time series, the total emissions on average increased by 1.1 percent from the previous Inventory. The changes ranged from the smallest increase, 0.4 percent (0.2 MMT CO₂ Eq.), in 2004, to the largest decrease, 2.4 percent (1.0 MMT CO₂ Eq.), in 2019.

Planned Improvements

Case 5:23-cv-00304-H

EPA notes the following improvements may be implemented or investigated within the next two or three inventory cycles pending time and resource constraints:

- Investigate anaerobic sludge digester and biogas data compiled by the Water Environment Federation (WEF) in collaboration with other entities as a potential source of updated activity data;
 - Due to lack of these data, the United States continues to use another method for estimating biogas produced. This method uses the standard 100 gallons/capita/day wastewater generation factor for the United States (Ten-State Standards). However, based on stakeholder input, some regions of the United States use markedly less water due to water conservation efforts so EPA plans to investigate updated sources for this method as well.

EPA notes the following improvements will continue to be investigated as time and resources allow, but there are no immediate plans to implement them until data are available or identified:

- Investigate additional sources for estimating wastewater volume discharged and discharge location for both domestic and industrial sources. For domestic wastewater, the goal would be to provide additional data points along the time series, while the goal for industrial wastewater would be to update the Tier 1 discharge methodology to a Tier 2 methodology.
- Investigate additional sources for domestic wastewater treatment type in place data.
- Continue to review whether sufficient data exist to develop U.S.-specific CH₄ or N₂O emission factors for domestic wastewater treatment systems, including whether emissions should be differentiated for systems that incorporate biological nutrient removal operations; and
- Investigate additional data sources for improving the uncertainty of the estimate of N entering municipal treatment systems.
- Evaluate the use of POTW BOD effluent discharge data from ICIS-NPDES. ¹³ Currently only half of POTWs report organics as BOD₅ so EPA would need to determine a hierarchy of parameters to appropriately sum all loads. Using these data could potentially improve the current methane emission estimates from domestic discharge.

¹³ ICIS-NPDES refers to EPA's Integrated Compliance Information System – National Pollutant Discharge Elimination System.

Evaluate the use of POTW N effluent discharge data from ICIS-NPDES. Currently only about 80 percent of POTWs report a form of N so EPA would need to determine an appropriate method to scale to the total POTW population. EPA is aware of a method for industrial sources and plans to determine if this method is appropriate for domestic sources.

Composting (CRF Source Category 5B1) 7.3

Composting of organic waste, such as food waste, garden (yard) and park waste, and wastewater treatment sludge and/or biosolids, is common in the United States. Composting reduces the amount of methane-generating waste entering landfills, destroys pathogens in the waste, sequesters carbon, and provides a source of organic matter. Composting can also generate a saleable product and reduce the need for chemical fertilizers when the end product is used as a fertilizer or soil amendment. This source category assumes all composting facilities are commercial, large-scale anaerobic windrow composting facilities with yard trimmings as the main waste stream composted (BioCycle 2017). Facilities using aerobic composting methods (e.g., aerated static piles, in-vessel composting) are operational in the United States, however national estimates of the material processed by these facilities are not readily available and therefore not included. Residential backyard composting is also not included in this source category.

Composting naturally converts a large fraction of the degradable organic carbon in the waste material into carbon dioxide (CO₂) through aerobic processes without anthropogenic influence. With anthropogenic influences (e.g., at commercial or large on-site composting operations), anaerobic conditions can be created in sections of the compost pile when there is excessive moisture or inadequate aeration (or mixing) of the compost pile, resulting in the formation of methane (CH₄). Methane in aerobic sections of a windrow pile are generally oxidized by microorganisms, which convert the CH₄ to CO₂ emissions. Even though CO₂ emissions are generated, they are not included in net greenhouse gas emissions for composting. Consistent with the 2006 IPCC Guidelines, net CO2 flux from carbon stock changes in waste material are estimated and reported under the LULUCF sector. The estimated CH₄ released into the atmosphere ranges from less than 1 percent to a few percent of the initial C content in the material (IPCC 2006). Depending on how well the compost pile is managed, nitrous oxide (N₂O) emissions can also be produced. The formation of N_2O depends on the initial nitrogen content of the material and is mostly due to nitrogen oxide (NO_x) denitrification during the thermophilic and secondary mesophilic stages of composting (Cornell 2007). Emissions vary and range from less than 0.5 percent to 5 percent of the initial nitrogen content of the material (IPCC 2006). Animal manures are typically expected to generate more N2O than, for example, yard waste, however data are limited.

From 1990 to 2021, the amount of waste composted in the United States increased from 3,810 kt to 22,946 kt (see Table 7-42). There was some fluctuation in the amount of waste composted between 2006 to 2009 where a peak of 20,063 kt composted was observed in 2008, which decreased to 18,838 kt composted the following year, presumably driven by the economic crisis of 2009 (data not shown). Since 2009, the amount of waste composted has gradually increased, and when comparing 2010 to 2021, a 25 percent increase in waste composted is observed. Emissions of CH₄ and N₂O from composting from 2010 to 2021 have increased by the same percentage.

In 2021, CH₄ emissions from composting (see Table 7-40 and Table 7-41) were 2.6 MMT CO₂ Eq. (92 kt), and N₂O emissions from composting were 1.8 MMT CO₂ Eq. (7 kt), representing consistent emissions trends over the past several years. Composted material primarily includes yard trimmings (grass, leaves, and tree and brush trimmings) and food scraps from the residential and commercial sectors (such as grocery stores; restaurants; and school, business, and factory cafeterias). The composted waste quantities reported here do not include small-scale backyard composting and agricultural composting mainly due to the lack of consistent and comprehensive national data. Additionally, it is assumed that backyard composting tends to be a more naturally managed process with less chance of generating anaerobic conditions and CH₄ and N₂O emissions. Agricultural composting is accounted for in Volume 4, Chapter 5 (Cropland) of this Inventory, as most agricultural composting operations are assumed to landapply the resultant compost to soils.

The growth in composting since the 1990s and specifically over the past decade may be attributable to the following factors: (1) the enactment of legislation by state and local governments that discouraged or banned the disposal of yard trimmings and/or food waste in landfills, (2) an increase in yard trimming collection and yard trimming drop off sites operated by local solid waste management districts/divisions, (3) an increased awareness of the environmental benefits of composting, and (4) loans or grant programs to establish or expand composting infrastructure.

Most bans or diversion laws on the disposal of yard trimmings were initiated in the early 1990s by state or local governments (U.S. Composting Council 2010). California, for example, enacted a waste diversion law for organics including yard trimmings and food scraps in 1999 (AB939) that required jurisdictions to divert 50 percent of the waste stream by 2000, or be subjected to fines. Currently, 20 states representing up to 42 percent of the nation's population have enacted legislation banning yard waste from landfill disposal (U.S. Composting Council 2022). Additional initiatives at the metro and municipal level also exist across the United States. Roughly 4,713 composting facilities exist in the United States with most (57.2 percent) composting yard trimmings only (BioCycle 2017).

In the last decade, bans and diversions for food waste have also become more common. As of 2022, eight states (California, Connecticut, Massachusetts, New Jersey, New York, Orgon, Vermont, Washington) and seven local governments (Austin, TX; Boulder, CO; Hennepin County, MN; Portland, OR; New York City, NY; San Francisco, CA; Seattle, WA) had implemented organic waste bans or mandatory recycling laws to help reduce organic waste entering landfills, with most having taken effect after 2013 (U.S. Composting Council 2022). In most cases, organic waste reduction in landfills is accomplished by following recycling guidelines, donating excess food for human consumption, or by sending waste to organics processing facilities (Harvard Law School and CET 2019). An example of an organic waste ban as implemented by California is the California Mandatory Recycling Law (AB1826), which requires companies to comply with organic waste recycling procedures if they produce a certain amount of organic waste and took effect on January 1, 2015 (Harvard Law School and CET 2019). In 2017, *BioCycle* released a report in which 27 of 43 states that responded to their organics recycling survey noted that food waste (collected residential, commercial, institutional, and industrial food waste) was recycled via anaerobic digestion and/or composting. These 27 states reported an estimated total of 1.8 million tons of food waste diverted from landfills in 2016 (BioCycle 2018b). A growing number of initiatives to encourage households and businesses to compost or beneficially reuse food waste also exist.

Table 7-40: CH₄ and N₂O Emissions from Composting (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
CH ₄	0.4	2.1	2.7	2.5	2.5	2.6	2.6
N_2O	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Total	0.7	3.6	4.7	4.3	4.3	4.4	4.4

Note: Totals by gas may not sum due to independent rounding.

Table 7-41: CH₄ and N₂O Emissions from Composting (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
CH ₄	15	75	98	90	91	92	92
N ₂ O	1	6	7	7	7	7	7

Methodology

Methane and N_2O emissions from composting depend on factors such as the type of waste composted, the amount and type of supporting material (such as wood chips and peat) used, temperature, moisture content (e.g., wet and fluid versus dry and crumbly), and aeration during the composting process.

The emissions shown in Table 7-40 and Table 7-41 were estimated using the IPCC default (Tier 1) methodology (IPCC 2006), which is the product of an emission factor and the mass of organic waste composted (note: no CH₄ recovery is expected to occur at composting operations in the emission estimates presented):

Equation 7-48: Greenhouse Gas Emission Calculation for Composting

 $E_i = M \times EF_i$

where,

E_i = CH₄ or N₂O emissions from composting, kt CH₄ or N₂O

M = mass of organic waste composted in kt

EF_i = emission factor for composting, 4 t CH₄/kt of waste treated (wet basis) and

0.3 t N₂O/kt of waste treated (wet basis) (IPCC 2006)

i = designates either CH₄ or N₂O

Per IPCC Tier 1 methodology defaults, the emission factors for CH_4 and N_2O assume a moisture content of 60 percent in the wet waste (IPCC 2006). While the moisture content of composting feedstock can vary significantly by type, composting as a process ideally proceeds between 40 to 65 percent moisture (University of Maine 2016; Cornell 1996).

Estimates of the quantity of waste composted (M, wet weight as generated) are presented in Table 7-42 for select years. Estimates of the quantity composted for 1990 and 2005 were taken from EPA's *Advancing Sustainable Materials Management: Facts and Figures* 2015 (EPA 2018); estimates of the quantities composted for 2017 to 2018 were taken from EPA's *Advancing Sustainable Materials Management: 2018 Tables and Figures* (EPA 2020a); the estimate of the quantity composted for 2019 to 2021 were extrapolated using the 2018 quantity composted and a ratio of the U.S. population growth between 2018 to 2019, 2019 to 2020, and 2020 to 2021, respectively (U.S. Census Bureau 2021 and U.S. Census Bureau 2022). Estimates of waste composted by commercial facilities in Puerto Rico were provided for select years by EPA Region 2 (Kijanka 2020). This data includes amount of waste composted at three facilities in Puerto Rico for 2017, 2018, and 2019, ranging from approximately 1,200 kt to a high of 15,000 kt. The average waste composted for these years was used as the annual amount composted for the respective facility for years the facility was operational. The annual quantity of composted waste in Puerto Rico was forecasted for 2020 and 2021 using available data from prior years, assumed metro area population data near where each facility is located, and the Microsoft Excel FORECAST function to obtain annual composting estimates.

Table 7-42: U.S. Waste Composted (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Waste Composted	3,810	18,655	24,501	22,594	22,698	22,918	22,946

Uncertainty

The major uncertainty drivers are the assumption that all composting emissions come from commercial windrow facilities and the use of default emission factors (IPCC 2006) which is tied to a homogenous mixture of waste processed across the country (largely yard trimmings). Data presented by BioCycle (BioCycle 2017) confirm most composting operations use the windrow method and yard trimmings are the largest share of material composted across the country, but there are other composting methods used and waste characteristics will vary at a facility level. Additionally, there are composting operations in Puerto Rico and U.S. territories that are not explicitly included in the national quantity of material composted as reported in the EPA Sustainable Materials Management Reports because the methodological scope does not include Puerto Rico and U.S. territories. EPA took steps to include emissions from Puerto Rico and U.S. Territories beginning in the 1990 to 2020 inventory and will continue to seek out additional data in future Inventories.

The estimated uncertainty from the 2006 IPCC Guidelines is ±58 percent for the Tier 1 methodology and considers the individual emission factors applied to the default emission factors and activity data.

Emissions from composting in 2021 were estimated to range between 1.8 and 7.0 MMT CO₂ Eq., which indicates a range of 58 percent below to 58 percent above the 2021 emission estimate of each gas (see Table 7-43).

Table 7-43: Tier 1 Quantitative Uncertainty Estimates for Emissions from Composting (MMT CO₂ Eq. and Percent)

Source	Gas			Uncertainty Range Relative to Emission E					
		(MMT CO ₂ Eq.)	(MMT (CO ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
	CH ₄	2.6	1.1	4.1	-58%	+58%			
Composting	N_2O	1.8	0.8	2.9	-58%	+58%			
	Total	4.4	1.8	7.0	-58%	+58%			

QA/QC and Verification

General QA/QC procedures were applied to data gathering and input, documentation, and calculations consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). No errors were found for the current Inventory.

Recalculations Discussion

The U.S. population estimate for 2020 was revised with current U.S. Census Bureau data (U.S. Census Bureau 2022). Because the 2020 composting estimates are extrapolated based on population growth, this recalculation also resulted in a nominal increase (1 percent or 145 kt) in the quantity of material composted for 2020 compared to that in the 1990 to 2020 Inventory report.

In addition, for the current Inventory, CO₂-equivalent estimates of total CH₄ and N₂O emissions from composting have been revised to apply the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ has increased from 25 to 28, leading to an overall increase in CO₂-equivalent CH₄ emissions while the GWP for N₂O decreased from 298 to 265 leading to a decrease in CO₂-equivalent N₂O emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the change in CO₂-equivalent CH₄ emissions was a 12 percent increase for each year of the time series, while the change in CO₂-equivalent N₂O emissions was an 11 percent decrease for each year of the time series. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements. The net impact from these updates was an average annual 1 percent increase in composting emissions for the time series.

Planned Improvements

EPA recently completed a literature search on emission factors and composting systems and management techniques that were documented in a draft technical memorandum. The purpose of this literature review was to compile all published emission factors specific to various composting systems and composted materials in the United States to determine whether the emission factors used in the current methodology can be revised or expanded to account for geographical differences and/or differences in composting systems used. For example, outdoor composting processes in arid regions typically require the addition of moisture compared to similar

composting processes in wetter climates. In general, there is a lack of facility-specific data on the management techniques and sum of material composted to enable the use of different emission factors. EPA will continue to seek out more detailed data on composting facilities to enable this improvement in the future.

Relatedly, EPA has received comments during previous Inventory cycles recommending that calculations for the composting sector be based on waste subcategories (i.e., leaves, grass and garden debris, food waste) and category-specific moisture contents. At this time, EPA is not aware of any available datasets which would enable estimations to be performed at this level of granularity. EPA will continue to search for data which could lead to the development of subcategory-specific composting emission factors to be used in future Inventory cycles.

EPA has put significant work into its Excess Food Opportunities Map dataset, including the compilation of composting facilities and feedstock accepted across the country. Additionally, the EPA's 2018 Wasted Food Report (EPA 2020b) includes estimates of composted waste for individual sectors (e.g., food and beverage manufacturing, restaurants/food services, hospitals, correctional facilities, office buildings). Estimates are provided for one year, 2018. The Inventory compilation team plans to review this report's estimates in comparison to the EPA's Facts and Figures report to identify sectors that are not duplicated in the Facts and Figures reports and develop a methodology to generate estimates for all years in the Inventory time series (1990 through 2021).

EPA will also continue to seek out activity data including processing capacity and years of operation for commercial composting facilities in Puerto Rico (for additional years), Guam, and other U.S. Territories for inclusion in a future Inventory.

Anaerobic Digestion at Biogas Facilities 7.4 (CRF Source Category 5B2)

Anaerobic digestion is a series of biological processes in the absence of oxygen in which microorganisms break down organic matter, producing biogas and digestate. The biogas primarily consists of CH₄, biogenic CO₂, and trace amounts of other gases such as N₂O (IPCC 2006) and is often combusted to produce heat and power, or further processed into renewable natural gas or for use as a transportation fuel. Digester gas contains approximately 65 percent CH₄ (a normal range is 55 percent to 65 percent) and approximately 35 percent CO₂ (WEF 2012; EPA 1993). Methane emissions may result from a fraction of the biogas that is lost during the process due to leakages and other unexpected events (0 to 10 percent of the amount of CH₄ generated, IPCC 2006), collected biogas that is not completely combusted, and entrained gas bubbles and residual gas potential in the digestate. Carbon dioxide emissions are biogenic in origin and should be reported as an informational item in the Energy Sector (IPCC 2006). Volume 5 Chapter 4 of the 2006 IPCC Guidelines notes that at biogas plants where unintentional CH4 emissions are flared, CH₄ emissions are likely to be close to zero.

Anaerobic digesters differ based on the operating temperature, feedstock type and moisture content, and mode of operation. The operating temperature dictates the microbial communities that live in the digester. Mesophilic microbes are present at temperatures ranging from 85 to 100 degrees Fahrenheit while thermophilic microbes thrive at temperatures ranging from 122 to 140 degrees Fahrenheit (WEF 2012). Digesters may process one or more types of feedstock, including food waste; municipal wastewater solids; livestock manure; industrial wastewater and residuals; fats, oils, and grease; and other types of organic waste streams. Co-digestion (multiple feedstocks) is employed to increase methane production in cases where an organic matter type does not break down easily. In co-digestion, various organic wastes are decomposed in a singular anaerobic digester by using a combination of wastewater solids or manure and food waste from restaurants or food processing industry, a combination of manure and waste from energy crops or crop residues (EPA 2016), or alternative combinations of feedstock. The moisture content of the feedstock (wet or dry) impacts the amount of biogas generation. Wet anaerobic digesters process feedstock with a solids content of less than 15 percent while dry anaerobic digesters process feedstock with a solids content greater than 15 percent (EPA 2020). Digesters may also operate in batch or

continuous mode, which affects the feedstock loading and removal. Batch anaerobic digesters are manually loaded with feedstock all at once and then manually emptied while continuous anaerobic digesters are continuously loaded and emptied with feedstock (EPA 2020).

The three main categories of anaerobic digestion facilities included in national greenhouse gas inventories include the following:

- Anaerobic digestion at biogas facilities, or stand-alone digesters, can be industry-dedicated digesters that
 process waste from on industry or industrial facility (typically food of beverage waste from
 manufacturing), or multi-source digesters that process feedstocks from various sources (e.g., municipal
 food scraps, manure, food processing waste). Some stand-alone digesters also co-digest other organics
 such as yard waste.
- On-farm digesters manage organic matter and reduce odor generated by farm animals or crops. On-farm
 digesters are found mainly at dairy, swine, and poultry farms where there is the highest potential for
 methane production to energy conversion. On-farm digesters may also accept food waste as feedstock for
 co-digestion.
- Digesters at water resource recovery facilities (WRRF) produce biogas through the treatment and reduction of wastewater solids. Some WRRF facilities may also accept and co-digest food waste.

This section focuses on stand-alone anaerobic digestion at biogas facilities. Emissions from on-farm digesters are included Chapter 5 (Agriculture) and AD facilities at WRRFs are included in Section 7.2 (Wastewater Treatment).

From 1990 to 2021, the estimated amount of waste managed by stand-alone digesters in the United States increased from approximately 786 kt to 8,263 kt, an increase of 951 percent. As described in the Uncertainty section, no data sources present the annual amount of waste managed by these facilities prior to 2015 when the EPA began a comprehensive data collection survey. Thus, the emission estimates between 1990 and 2014, and for 2019 to 2021 are general estimates extrapolated from data collected for years 2015 to 2018. The steady increase in the amount of waste processed over the time series is likely driven by increasing interest in using biogas produced from waste as a renewable energy source and other organics diversion goals.

In 2021, emissions from stand-alone anaerobic digestion at biogas facilities were approximately 0.2 MMT CO_2 Eq. (6 kt) (see Table 7-44 and Table 7-45).

Table 7-44: CH₄ Emissions from Anaerobic Digestion at Biogas Facilities (MMT CO₂ Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
CH ₄ Generation	+	0.1	0.2	0.2	0.2	0.2	0.2
CH ₄ Recovery	(+)	(+)	(+)	(+)	(+)	(+)	(+)
CH ₄ Emissions	+	+	0.2	0.2	0.2	0.2	0.2

⁺ Absolute value does not exceed 0.05 MMT

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values

Table 7-45: CH₄ Emissions from Anaerobic Digestion at Biogas Facilities (kt CH₄)

Activity	1990	2005	2017	2018	2019	2020	2021
CH₄ Generation	1	2	7	7	7	7	7
CH₄ Recovery	(+)	(+)	(+)	(+)	(+)	(+)	(+)
CH ₄ Emissions	1	2	6	6	6	6	6

⁺ Does not exceed 0.5 kt.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values.

Methodology

Methane emissions from anaerobic digestion depend on factors such as the type of waste managed, the amount and type of supporting material (such as wood chips and peat) used, temperature, moisture content (e.g., wet and fluid versus dry and crumbly), and aeration during the digestion process.

The emissions presented in Table 7-44 were estimated using the IPCC default (Tier 1) methodology (Volume 5, Chapter 4, IPCC 2006) given in Equation 7-49 below, which is the product of an emission factor and the mass of organic waste processed. Only CH_4 emissions are estimated because N_2O emissions are considered negligible (IPCC 2006). Some Tier 2 data are available (annual quantity of waste digested) for the later portion of the time series (2015 and later).

Equation 7-49: Methane Emissions Calculation for Anaerobic Digestion

 $CH_4 Emissions = \sum_i (M_i \times EF_i) \times 10^{-3} - R$

where.

CH₄ Emissions = total CH₄ emissions in inventory year, Gg CH₄

M_i = mass of organic waste treated by biological treatment type i, Gg, see Table 7-46

EF = emission factor for treatment i, g CH₄/kg waste treated, 0.8 Mg/Gg CH₄

i = anaerobic digestion

R = total amount of CH₄ recovered in inventory year, Gg CH₄

Equation 7-50: Recovered Methane Estimation for Anaerobic Digestion

$$R = Biogas \times 0.0283 \times \frac{minutes}{vear} \times Biogas CH_4 Density \times C_{CH4} \times \frac{1}{10^9} \times (1 - DE)$$

where,

Biogas = the amount of biogas produced, standard cubic feet per minute (scfm)

0.0283 = conversion factor cubic meter/cubic feet

525,600 = minutes per year

= CH_4 density in biogas (EPA 1993), g CH_4/m^3 CH_4

65% = C_{CH4}, concentration of CH₄ in the biogas (WEF 2012; EPA 1993)

1/10⁹ = conversion factor, grams to kt

0.99 = destruction efficiency for combustion unit

Per IPCC Tier 1 methodology defaults, the emission factor for CH₄ assumes a moisture content of 60 percent in the wet waste (IPCC 2006). Both liquid and solid wastes are processed by stand-alone digesters and the moisture content entering a digester may be higher. One emission factor recommended by the 2006 IPCC Guidelines (0.8 Mg/Gg CH₄) is applied for the entire time series (IPCC 2006 Volume 5, Chapter 4, Table 4.1).

The annual quantity of waste digested is sourced from EPA surveys of anaerobic digestion facilities (EPA 2018, 2019, and 2021). The EPA was granted the authority to survey anaerobic digestion facilities that process food waste annually through an Information Collection Request (ICR No. 2533.01). The scope includes stand-alone and co-digestion facilities (on-farm and water resource recovery facilities [WRRF]). Three reports with survey results have been published to date:

- Anaerobic Digestion Facilities Processing Food Waste in the United States in 2015: Survey Results (EPA 2018)
- Anaerobic Digestion Facilities Processing Food Waste in the United States in 2016: Survey Results (EPA 2019)
- Anaerobic Digestion Facilities Processing Food Waste in the United States in (2017 & 2018): Survey Results (EPA 2021)

These reports present aggregated survey data including the annual quantity of waste processed by digester type (i.e., stand-alone, on-farm, and WRRF); waste types accepted; biogas generation and end use; and more. The aggregated data presented in the EPA reports are underestimates of the actual amount of processed waste and biogas produced because (1) surveys rarely achieve a 100 percent response rate and some fraction of facilities in each survey year did not respond to the survey; (2) EPA focused this survey on facilities that process food waste, and there may be additional operational digesters that are not located on farms or at wastewater treatment plants; and (3) EPA has done due diligence to identify all stand-alone digesters that process food waste but may not have identified all facilities across the United States and its territories. The amount of waste digested as reported in the survey reports were assumed to be in wet weight; the majority of stand-alone digesters were found to be wet and mesophilic (EPA 2019).

The annual quantity of waste digested at stand-alone digesters for 1990 to 2014 (only 1990 and 2005 are shown in Table 7-46) was estimated by multiplying the count of estimated operating facilities (as presented in Table 7-47) by the weighted average of waste digested in 2015 and 2016 collected through EPA's survey data (EPA 2018; EPA 2019). Masked survey responses of food and non-food waste processed were shared with the Inventory team by the EPA team leading the EPA AD Data Collection Surveys. This provided an accurate count of the number of facilities that provided annual quantities of digested waste, which matters for the weighted average. The weighted average applied to the current inventory is calculated as follows for 1990 to 2014:

Equation 7-51: Weighted Average of Waste Processed

$$Weighted \ Average \ Waste \ Processed = \frac{(W_{2016} \times Fac_{2016} + W_{2015} \times Fac_{2015})}{(Fac_{2016} + Fac_{2015})}$$

where,

W = total waste processed in the respective survey year, food and non-food waste (short tons).

Fac = the number of facilities that reported an amount of waste processed in the respective survey year. Note the number of facilities that provided an annual quantity of waste processed data was internally shared and differs from the total number of facilities that responded to the EPA surveys as presented in EPA (2018, 2019).

Estimates of the quantity of waste digested (M, wet weight as generated) are presented in for select years and the number of facilities that reported annual quantities of waste digested to the EPA survey were 45 and 44 in 2015 and 2016, respectively (using masked facility data provided by the EPA AD survey data collection team).

Estimates of the quantity of waste digested for 1990 to 2014 are calculated by multiplying the weighted average of waste digested from 2015 and 2016 survey data (216,494 short tons) by the count of operating facilities in each year. This calculation assumes that each facility operates continuously from the first year of operation for the remainder of the time series. Additional efforts will be made to quantify the number of operating facilities and estimates of the total waste digested by year for future Inventories as described in the Planned Improvements section. Estimates of the quantity digested for 2015 and 2016 were taken from EPA's AD survey data (EPA 2018; EPA 2019, respectively). The estimate of waste digested for 2019 through 2021 were extrapolated using the average of the waste digested from the 2017 and 2018 survey data (EPA 2021) as a proxy. The average did not include data from 2015 and 2016 because there is a drop in the amount of waste digested by nearly 1 million tons between 2016 and 2017. The quantities digested between 2015 and 2016 are similar, and quantities digested between 2017 and 2018 are similar. Estimates for 2019 to 2021 will be updated as future EPA survey reports are published.

Table 7-46: U.S. Waste Digested (kt) from 1990-2021

Activity	1990	2005	2017	2018	2019	2020	2021
Waste Digested ^a	786	2,357	8,206	8,320	8,263	8,263	8,263

^a The amount of waste digested primarily consists of food waste. The amount processed for all years is likely an underestimate because the estimates were developed from survey data provided by operating facilities for 2015 to 2018 (EPA 2018; EPA 2019; EPA 2021). Facilities that did not respond to the EPA surveys are not included and all years except 2015 to 2018 are estimated using assumptions regarding the number of operating facilities and the weighted average of waste digested. Additionally, the liquid portion of the waste digested in 2015 and 2016 are not included due to limited information on the specific waste types to perform the unit conversion to kt. EPA converted liquid waste to tons for 2018 and 2019 using a conversion factor of 3.8 pounds per gallon (EPA 2021). The weighted average of waste digested in 2015 and 2016 (as reported in EPA 2018 and 2019) is used as the average for 1990 to 2014, and the average waste digested as reported in EPA (2021) is used as a proxy for years 2019 to 2021.

The estimated count of operating facilities is calculated by summing the count of digesters that began operating by year over the time series. The year a digester began operating is sourced from EPA (2021). This assumes all facilities are in operation from their first year of operation throughout the remainder of the time series, including facilities prior to 1990. This is likely an overestimate of facilities operating per year but does not necessarily translate to an overestimate in the amount of waste processed because a weighted average of waste processed for the surveyed facilities is applied to these years. The number of facilities in 1990 to 2014 are directly used in calculating the emissions, while the directly reported annual amount of waste processed from the survey data are used for 2015 to 2021.

Table 7-47: Estimated Number of Stand-Alone AD Facilities Operating from 1990-2021

Year	1990	2005	2017	2018	2019	2020	2021
Estimated Count of Operational Facilities	4	12	68	68	68	68	68

^a The count of operational facilities was visually estimated from Figure 5 in EPA (2021), which presents the count of the first year of digester operation. The number of operational facilities by year is assumed to be the cumulative total from the prior year. This method assumes all facilities are operating from 1990, or their first year of operation, to 2020. The number of facilities operating between 2015 to 2018 are equal to the number of facilities surveyed by EPA (EPA 2018, 2019, and 2021). The number of facilities operating in 2019 and 2020 are assumed to be the same as the last survey report data year, i.e., 2018 as reported in EPA (2021). These assumptions are further discussed in the Methodology and Time-Series Consistency section.

Activity data for the amount of biogas recovered (R in the emission calculation equation) is limited across the time series. Currently, there are only four data points (2015, 2016, 2017, and 2018) represented for the entire sector, as reported in the EPA AD Data Collection Survey reports (EPA 2018, 2019, and 2021). The total of biogas produced annually from the survey respondents is reported in standard cubic feet per minute (scfm) as shown in Table 7-48. Volume 5, Chapter 4 of the 2006 IPCC Guidelines notes that only emissions from flaring can be reported under the waste sector. The top three known uses of the biogas generated by stand-alone digesters are combined heat and power (CHP), the production of electricity that is sold to the grid, and using the biogas to fuel boilers and furnaces to heat the digestor and other facility spaces (EPA 2018; EPA 2019). Thus, no biogas is assumed to be flared.

Table 7-48: Estimated Biogas Produced and Methane Recovered from Anaerobic Digestion at Biogas Facilities Operating from 1990-2021^a

Activity	1990	2005	2017	2018	2019	2020	2021
Total Biogas Produced (scfm)b	767	2,301	6,402	7,282	6,842	6,842	6,842
R, recovered CH₄ from biogas (kt) ^c	(0.05)	(0.14)	(0.41)	(0.47)	(0.49)	(0.49)	(0.49)

^a Total biogas produced in standard cubic feet per minute (scfm) was reported in aggregate in the EPA survey data (EPA 2018, 2019, 2021) for 2015 to 2018. The quantities presented in this table are likely underestimates because not all operational facilities provided a survey response to the EPA AD Data Collection Surveys.

^b Data for all years in the time series except for 2015 and 2016 are extrapolated using the average of the total biogas collected between 2015 to 2018, divided by the average number of survey responses to generate a weighted average

estimate of biogas collected per facility, which is then multiplied by the total facility count (as shown in Table 7-47).

^c The quantity of CH₄ recovered from the biogas produced is estimated for all years except 2015 to 2018, which are taken from EPA (2018), EPA (2019), and EPA (2021).

Note: Parentheses indicate negative values.

Uncertainty

The methodology applied for the 1990 to 2014 emissions estimates should be considered a starting point to build on in future years if additional historical data become available. Four years of facility-provided data are available (2015 to 2018) while the rest of the time series is estimated based on an assumption of facility counts and the 2015 and 2016 weighted average annual waste digested as calculated from survey data. The major limitations, and uncertainty drivers in the emissions estimates, are related to the uncertainty in assumptions to ensure completeness across the time series and the limitations in the EPA AD survey data, as described below:

- 1. The EPA AD survey (EPA 2018; EPA 2019; EPA 2021) did not receive a 100 percent response rate, meaning that the survey data represent a portion, albeit the majority, of stand-alone digesters, annual waste processed, and biogas recovered. The methodology applied here did not attempt to estimate waste digested by facilities that did not respond to the survey, which likely underestimates the quantity of waste digested and CH₄ emissions.
- 2. The EPA AD survey data (EPA 2018; EPA 2019) present both food and non-food waste digested. The non-food waste was reported as liquid (gallons) and solid (tons). The quantity of liquid waste managed is not included in the estimated quantity of annual waste digested for 2015 and 2016, which is used as a proxy for 1990 to 2014 because data on the waste types are not available to convert the quantity from gallons to tons. This slightly underestimates the quantity of waste digested and CH₄ emissions. EPA (2021) did convert the liquid waste managed to tons for 2017 and 2018 using a general conversion factor.
- 3. The assumption required to estimate the activity data for 1990 to 2014 may overestimate the number of facilities in operation because it assumes that each facility operates from its start year for the entire time series (i.e. facility closures are not taken into account). This introduces a large amount of uncertainty in the estimates compared to years where there is directly reported survey data. It is unclear whether this under- or over-estimates the quantity of waste digested and CH₄ emissions.

The estimated uncertainty from the 2006 IPCC Guidelines is ±54 percent for the Approach 1 methodology.

Emissions from anaerobic digestion at stand-alone biogas facilities in 2021 were estimated to be between 0.1 and 0.3 MMT CO_2 Eq., which indicates a range of 54 percent below to 54 percent above the 2021 emission estimate of CH_4 (see Table 7-49). A ± 20 percent uncertainty factor is applied to the annual amount of material digested (i.e., the activity data), which was developed with expert judgment (Bronstein 2021). A ± 50 percent default uncertainty factor is applied to the CH_4 emission factor (IPCC 2006). Using the IPCC's error propagation equation (Equation 3.1 in IPCC 2006 Volume 1, Chapter 3), the combined uncertainty percentage is ± 54 percent.

Table 7-49: Approach 1 Quantitative Uncertainty Estimates for Emissions from Anaerobic Digestion (MMT CO₂ Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate						
	Gas	(MMT CO ₂ Eq.)	(MMT	CO ₂ Eq.)	(%)				
			Lower	Upper	Lower	Upper			
			Bound	Bound	Bound	Bound			
Anaerobic Digestion at Biogas Facilities	CH₄	0.2	0.1	0.3	-54%	+54%			

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 780 of 1050 PageID 4228

QA/QC and Verification

General QA/QC procedures were applied to data gathering and input, documentation, and calculations consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1, Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). No errors were found for the current Inventory.

Recalculations Discussion

For the current Inventory, estimates of CO₂-equivalent CH₄ emissions from anaerobic digestion at biogas facilities have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH₄ has increased from 25 to 28, leading to an overall increase in CO₂-equivalent CH₄ emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the change in CO₂-equivalent CH₄ emissions was a 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the Inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA will continue to incorporate updated survey data from future EPA AD Data Collection Surveys when the survey data are published. These revisions will change the estimated emissions for 2019 to 2021.

EPA will also re-assess how best to estimate annual waste processed using proxy data for years between the EPA AD Data Collection Survey reports as needed (e.g., for 2019, 2020, 2021). The methodology described here assumes the same average amount of waste is processed each year for 2019 through 2021.

EPA continues to seek out data sources to confirm the estimated number of operational facilities by year prior to 2015 and consider how best to estimate the quantity of waste processed per year by these facilities with the goal of better estimating the annual quantity of waste digested between 1990 to 2014. Available data will also be compiled where available for facilities that did not directly respond to the EPA AD Data Collection surveys for completeness.

EPA will seek out data sources to confirm the amount of recovered biogas for years prior to 2015 (i.e., the years prior to the EPA AD Data Collection Surveys). Currently, partial data of recovered biogas are available between 2015 to 2018 from the EPA AD Data Collection Surveys. The primary purpose of this improvement will be to understand whether the range of recovered biogas from the survey data are reflective of earlier years in the time series.

7.5 Waste Incineration (CRF Source Category 5C1)

As stated earlier in this chapter, carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) emissions from the combustion of waste are accounted for in the Energy sector rather than in the Waste sector because almost all combustion of municipal solid waste (MSW) in the United States occurs at waste-to-energy facilities where useful energy is recovered. Similarly, the Energy sector also includes an estimate of emissions from burning waste tires and hazardous industrial waste, because virtually all of the combustion occurs in industrial and utility boilers that recover energy. The combustion of waste in the United States in 2021 resulted in 12.8 MMT CO_2 Eq. of emissions. For more details on emissions from the combustion of waste, see Section 3.3 of the Energy chapter.

Additional sources of emissions from waste combustion include non-hazardous industrial waste incineration and medical waste incineration. As described in Annex 5 of this report, data are not readily available for these sources and emission estimates are not provided.

An analysis of the likely level of medical waste incineration emissions was conducted based on a 2009 study of hospital/ medical/ infectious waste incinerator (HMIWI) facilities in the United States (RTI 2009). Based on that study's information of waste throughput and an analysis of the fossil-based composition of the waste, it was determined that annual greenhouse gas emissions for medical waste incineration would be below 500 kt CO2 Eq. per year and considered insignificant for the purposes of Inventory reporting under the UNFCCC. More information on this analysis is provided in Annex 5.

Furthermore, an analysis was conducted on the likely level of sewage sludge incineration emissions based on the total amount of sewage sludge generated and assumed percent incineration. Based on assumed amount of sludge incinerated and non-CO₂ factors for solid biomass it was determined that annual greenhouse gas emissions for sewage sludge incineration would be below 500 kt CO₂ Eq. per year and considered insignificant for the purposes of Inventory reporting under the UNFCCC. More information on this analysis is provided in Annex 5.

7.6 Waste Sources of Precursor **Greenhouse Gases**

In addition to the main greenhouse gases addressed above, waste generating and handling processes are also sources of precursors to greenhouse gases. The reporting requirements of the UNFCCC14 request that information should be provided on precursor emissions, which include carbon monoxide (CO), nitrogen oxides (NOx), nonmethane volatile organic compounds (NMVOCs), and sulfur dioxide (SO₂). These gases are not direct greenhouse gases, but can indirectly impact Earth's radiative balance by altering the concentrations of other greenhouse gases (e.g., tropospheric ozone) and atmosphere aerosol (e.g., particulate sulfate). Total emissions of NOx, CO, NMVOCs, and SO₂ from waste sources for the years 1990 through 2021 are provided in Table 7-50.

Table 7-50: Emissions of NO_x, CO, NMVOC, and SO₂ from Waste (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
NO _x	84	51	74	73	73	76	76
CO	1,028	1,178	1,182	1,182	1,182	1,342	1,342
NMVOCs	870	152	156	156	157	173	173
SO_2	36	20	23	23	23	33	33

Methodology and Time-Series Consistency

Emission estimates for 1990 through 2021 were obtained from data published on the National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data website (EPA 2023a). For Table 7-50, NEI reported emissions of CO, NOx, SO₂, and NMVOCs are recategorized from NEI Emissions Inventory System (EIS) sectors. The EIS sectors are mapped to categories more closely aligned with UNFCCC reporting sectors and categories, based on based on

¹⁴ See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

discussions between the EPA Inventory and NEI staff (see crosswalk documented in Annex 6.3). ¹⁵ EIS sectors mapped to the waste sector categories in this report include: waste disposal and recycling (landfills; publicly owned treatment works; industrial wastewater; treatment, storage, and disposal facilities; waste incineration; and other). ¹⁶ As described in the NEI Technical Support Documentation (TSD) (EPA 2023b), emissions are estimated through a combination of emissions data submitted directly to the EPA by state, local, and tribal air agencies, as well as additional information added by the Agency from EPA emissions programs, such as the emission trading program, Toxics Release Inventory (TRI), and data collected during rule development or compliance testing. Within the NEI, there is only one EIS sector for waste generating and handling processes, so precursor estimates are aggregated in Table 7-50 for consistency with NEI reporting. Future presentations of this data may disaggregate emissions so it better maps to UNFCCC reporting categories.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021, which are described in detail in the NEI's TSD (EPA 2021). No quantitative estimates of uncertainty were calculated for this source category.

-

¹⁵ The NEI estimates and reports emissions from six criteria air pollutants (CAPs) and 187 hazardous air pollutants (HAPs) in support of National Ambient Air Quality Standards. EPA reported CAP emission trends are grouped into 60 sectors and 15 Tier 1 source categories, which broadly cover similar source categories to those presented in this chapter. For reporting precursor emissions in the common reporting format (CRF), EPA has mapped and regrouped emissions of greenhouse gas precursors (CO, NO_x, SO₂, and NMVOCs) from NEI's EIS sectors to better align with NIR source categories, and to ensure consistency and completeness to the extent possible. See Annex 6.3 for more information on this mapping.

¹⁶ Precursor emissions from waste incineration were reported in the Energy sector in the previous Inventory but are not disaggregated from the Waste sector in this report. EPA will further disaggregate waste-related EIS categories for the next (i.e., 1990 through 2022) Inventory.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 783 of 1050 PageID 4231

8. Other

The United States does not report any greenhouse gas emissions under the Intergovernmental Panel on Climate Change (IPCC) "Other" sector.

Recalculations and Improvements

Each year, many emission and sink estimates in the Inventory of U.S. Greenhouse Gas Emissions and Sinks are recalculated and revised, as efforts are made to improve the estimates through the use of better methods and/or data with the goal of improving inventory quality and reducing uncertainties, including the transparency, completeness, consistency, and overall usefulness of the report. In this effort, the United States follows the 2006 IPCC Guidelines (IPCC 2006), which state, "Both methodological changes and refinements over time are an essential part of improving inventory quality. It is good practice to change or refine methods when available data have changed; the previously used method is not consistent with the IPCC guidelines for that category; a category has become key; the previously used method is insufficient to reflect mitigation activities in a transparent manner; the capacity for inventory preparation has increased; improved inventory methods become available; and/or for correction of errors."

When methodological changes have been implemented, the previous Inventory's time series (i.e., 1990 to 2020) is assessed and potentially recalculated to reflect the change, per guidance in IPCC (2006). Changes in historical data are often the result of changes in statistical data supplied by other agencies, and these changes do not necessarily impact the entire time series. In addition, the current Inventory updates GWPs for calculating CO₂-equivalent emission estimates of non-CO₂ gases (CH₄, N₂O, HFCs, PFCs, SF₆, and NF₃) to reflect updated science. This Inventory has been revised to use the 100-year GWPs provided in the IPCC Fifth Assessment Report (AR5) (IPCC 2013). AR5 GWP values differ from those presented in the IPCC Fourth Assessment Report and used in the previous Inventories as required by earlier UNFCCC reporting guidelines. Recent decisions under the UNFCCC¹ require Parties to use 100-year GWP values from the IPCC Fifth Assessment Report (AR5) for calculating CO₂-equivalence in their national reporting (IPCC 2013) by the end of 2024. In preparation for upcoming UNFCCC requirements², this report reflects CO2-equivalent greenhouse gas totals using 100-year AR5 GWP values. The use of AR5 GWP values in this Inventory results in time-series recalculations for most inventory sources and sinks. Note, all estimates provided in sectoral chapters of this report are presented in both CO2 equivalents and unweighted units for non-CO₂ emissions.

The results of all methodological changes and historical data updates made in the current Inventory, including the quantitative effects of updating to from use of AR4 to AR5 GWPs in calculating CO₂-equivalent U.S. greenhouse gas emissions and sinks across the Energy, Industrial Processes and Product Use (IPPU), Agriculture, Land Use, Land Use-Change and Forestry, and Waste sectors are presented in Figure 9-2, while impacts on both total and net emissions by gas are presented in Table 9-1 and Table 9-2. Collectively, these changes resulted in an average annual increase of 44.1 MMT CO₂ Eq. (0.6 percent) in gross total emissions. Table 9-3 and Table 9-4 include the

¹ See paragraphs 1 and 2 of the decision on common metrics adopted at the 27th UNFCCC Conference of Parties (COP27) available online here: https://unfccc.int/sites/default/files/resource/cp2022 10a01 adv.pdf. The UNFCCC reporting guidelines require use of the 100-year GWPs listed in table 8.A.1 in Annex 8.A of Chapter 8 of the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, excluding the value for fossil methane.

² See Annex to decision 18/CMA.1 available online at https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf.

quantitative effects of methodological changes and historical data updates made in the current Inventory excluding the quantitative effects of updating from AR4 to AR5 GWPs in calculating CO₂-equivalent U.S. greenhouse gas emissions by gas across all sectors. The methodological changes and historical data updates resulted in an annual average increase of 19.6 MMT CO₂ Eq. (0.3 percent). The tables below present results relative to the previously published Inventory (i.e., the 1990 to 2020 report) in units of million metric tons of carbon dioxide equivalent (MMT CO2 Eq.). To understand the details of any specific recalculation or methodological improvement, see the Recalculations within each source/sink categories' section found in Chapters 3 through 7 of this report. A discussion of Inventory improvements in response to review processes is described in Annex 8.

The Inventory includes new categories not included in the previous Inventory that improve completeness of the national estimates. Specifically, the current report includes CO₂ emissions from substitution of ozone depleting substances, and the reporting of CO₂ from the biogenic components of municipal solid waste as a memo item.

The following source and sink categories underwent the most significant methodological and historical data changes. A brief summary of the recalculations and/or improvements undertaken are provided for these categories.

- Forest Land Remaining Forest Land: Changes in Forest Carbon Stocks (CO₂). The methods used in the current Inventory to compile estimates for forest ecosystem carbon stocks and stock changes and harvested wood products (HWPs) from 1990 through 2021 are consistent with those used in the previous (1990 through 2020) Inventory. Population estimates of carbon stocks and stock changes were compiled using NFI data from each U.S. state and national estimates were compiled by summing over all states. New NFI data in most states were incorporated in the latest Inventory which contributed to lower forest land area estimates and carbon stocks, particularly in Alaska with new data from 2018 to 2021. Fire data sources were also updated for Alaska through 2021 and this, combined with the new NFI data for the years 2018 through 2021, resulted in substantial changes in carbon stocks. These changes can be attributed to obtaining plot-level soil orders using the more refined gridded National Soil Survey Geographic Database (gNATSGO) dataset (Soil Survey Staff 2020a, 2020b), rather than the Digital General Soil Map of the United States (STATSGO2) dataset which had been used in previous Inventories. This resulted in a structural change in the soil carbon estimates for mineral and organic soils across the entire time series, particularly in Alaska where new data on forest area was included for the years 2018 through 2021. Finally, recent land-use change in Alaska (since 2015) also contributed to variability in soil carbon stocks and stock changes in recent years in the time series. New data included in the HWP time-series result in a minor decrease (<1 percent) in carbon stocks in the HWP pools but a substantial increase (60 percent) in the carbon stock change estimates for Products in Use and to a lesser extent (2 percent) in SWDS between the previous Inventory and the current Inventory. With the easing of the global pandemic and the return of consumers to the marketplace, there was a rebound in the purchase and accumulation of both paper and solid wood products. These changes resulted in an average annual increase in C stock change losses of 31.9 MMT CO2 Eq. (4.4 percent), across the 1990 through 2020 time series, relative to the previous Inventory. See Chapter 6, Section 6.2 for more information on recalculations.
- Wetlands Remaining Wetlands: Emissions from Flooded Land Remaining Flooded Land (CH₄). The 1990 through 2021 Inventory uses the National Wetlands Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory report used the National Hydrography Data (NHD) as the primary geospatial data source. The NWI is far more detailed than the NHD, resulting in increased emission estimates across the time series. The NWI also includes Alaska, Hawaii, and Puerto Rico, which were not included in the 1990 through 2020 Inventory. Emissions from reservoirs in Flooded Land Remaining Flooded Land were further increased by correcting the creation date of several large reservoirs in South Dakota, North Dakota, Alabama, Arkansas, Georgia, and South Carolina. These reservoirs were incorrectly classified as Land Converted to Flooded Land for a portion of the 1990 through 2020 time series but are classified as Flooded Land Remaining Flooded Land throughout the 1990 through 2021 Inventory time series. The 1990 through 2020

Inventory distinguished between reservoirs and inundation areas. Inundation areas were defined as periodically flooded lands that bordered a permanently flooded reservoir. The NWI includes both permanently and periodically flooded lands, but does not consistently discriminate between them, therefore inundation areas and reservoirs are consolidated into reservoirs for the 1990 through 2021 Inventory. The net effect of these recalculations was an average annual increase in CH₄ emission estimates from reservoirs of 23.4 MMT CO₂ Eq. (107.1 percent) over the time series.

- Biomass and Biofuel Consumption (CO₂). The CO₂ emissions associated with the biogenic components of MSW combustion were added to this year's report as a memo item. The emissions were calculated based on the same approach used to develop fossil CO₂ emissions from the fossil components of MSW as described in Section 3.3. The result of these changes was an increase in biogenic CO₂ emissions reported as a memo item relative to the previous Inventory. These combined impacts of these changes resulted in an average increase in emissions of 15.7 MMT CO₂ Eq., or 6.2 percent, from 1990 to 2020 relative to the previous Inventory. See Chapter 3, Section 3.10 for more information on recalculations.
- Agricultural Soil Management (N2O). Several improvements in this Inventory included a) incorporating new USDA-NRCS NRI data through 2017; b) extending the time series for crop histories through 2020 using USDA-NASS CDL data; c) incorporating USDA-NRCS CEAP survey data for 2013 to 2016; d) incorporating cover crop and tillage management information from the OpTIS remote-sensing data product from 2008 to 2020; e) modifying the statistical imputation method for the management activity data associated with about tillage practices, mineral fertilization, manure amendments, cover crop management, planting and harvest dates using gradient boosting instead of an artificial neural network; f) updating time series of synthetic N fertilizer sales data, PRP N and manure N available for application to soils; g) constraining synthetic N fertilization and manure N applications in the Tier 3 method at the state scale rather than the national scale; h) re-calibrating the soil C module in the DayCent model using Bayesian methods; and i) application of global warming potential values from the IPCC Fifth Assessment Report (AR5) (IPCC 2013). These combined impact from these changes resulted in an average increase in emissions of 10.9 MMT CO₂ Eq., or 3.9 percent, from 1990 to 2020 relative to the previous Inventory. See Chapter 5, Section 5.4 for more information on recalculations.
- Petroleum Systems (CH4). In this Inventory, an update that incorporates additional basin-level data from GHGRP Subpart W was implemented for several emission sources in the onshore production segment, including for pneumatic controllers, equipment leaks, chemical injection pumps, and storage tanks. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. The combined impact of revisions to 2020 petroleum systems CH₄ emission estimates on a CO₂-equivalent basis, compared to the previous Inventory, is an increase from 40.2 to 54.5 MMT CO₂ Eq. (14.2 MMT CO₂ Eq., or 35 percent). The recalculations resulted in higher CH₄ emission estimates on average across the 1990 through 2020 time series, compared to the previous Inventory, by 5.7 MMT CO_2 Eq., or 12.0 percent. See Chapter 3, Section 3.6 for more information on recalculations.
- Land Converted to Grassland: Changes in all Ecosystem Carbon Stocks (CO2). Recalculations are associated with routine annual incorporation of the latest FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks associated with conversions from Cropland Converted to Grassland (woodlands), Other Land Converted to Grassland, and Settlements Converted to Grassland; updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks from Forest Land Converted to Grassland; and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Grassland has an estimated increase in C stock changes of 2.9 MMT CO₂ Eq. (23.2 percent) on average over the time series.
- Land Converted to Cropland: Changes in all Ecosystem Carbon Stocks (CO2). Recalculations are associated with routine annual incorporation of the latest FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks

in Grassland Converted to Cropland (i.e., woodland conversion to cropland), updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Cropland, and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Cropland has an estimated larger C loss of 2.6 MMT CO_2 Eq. (4.9 percent) on average over the time series. See Chapter 6, Section 6.5 for more information on recalculations.

- Natural Gas Systems (CH₄). In this Inventory, an update that incorporates additional basin-level data from GHGRP Subpart W was implemented for several emission sources in the onshore production segment, including for pneumatic controllers, equipment leaks, chemical injection pumps, storage tanks, and liquids unloading. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. The combined impact of revisions to 2020 natural gas systems CH₄ emissions, compared to the previous Inventory, is an increase from 164.9 to 185.3 MMT CO₂ Eq. (20.4 MMT CO₂ Eq., or 12 percent). The recalculations resulted in an average increase in the annual CH₄ emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 2.5 MMT CO₂ Eq., or 1.3 percent. See Chapter 3, Section 3.7 for more information on recalculations.
- Fossil Fuel Combustion (CO₂). Several updates to activity data and emission factors led to recalculations of previous year results. The major updates include updated data from EIA sources (EIA 2023) for energy consumption statistics, industrial energy sector activity data, natural gas consumption, and petroleum statistics across the time series relative to the previous Inventory. The carbon content for propylene was updated from 65.95 kg CO₂/MMBtu to 67.77 kg CO₂/MMBtu to reflect values used in the EPA Greenhouse Gas Emission Factors Hub. Fuel consumption for the U.S. Territories provided by EIA's International Energy Statistics (EIA 2022) was updated across the time series. Updates were also made to the values of natural gas used for ammonia production which led to changes in energy sector adjustments. Overall, these revisions impacted estimates from the combustion of fossil fuels in a number of ways including decreased petroleum emissions from the residential sector, decreased petroleum emissions from U.S. Territories, increased natural gas emissions across all economic sectors, and decreased coal emissions from U.S. Territories. These changes resulted in an average annual increase of 2.5 MMT CO₂ Eq. (less than 0.05 percent) in CO₂ emissions from fossil fuel combustion relative to the previous Inventory. See Chapter 3, Section 3.1 for more information on recalculations.
- Land Converted to Settlements: Changes in all Ecosystem Carbon Stocks (CO₂). Recalculations are associated with routine annual incorporation of the latest FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Settlements and woodland conversion associated with Grassland Converted to Settlements, and updated estimates for mineral and organic soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Settlements has an estimated larger C loss of 2.3 MMT CO₂ Eq. on average over the time series. This represents a 2.9 percent increase in C stock changes for Land Converted to Settlements compared to the previous Inventory. See Chapter 6, Section 6.11 for more information on recalculations.

Figure 9-1: Impacts of Recalculations on Net Emissions

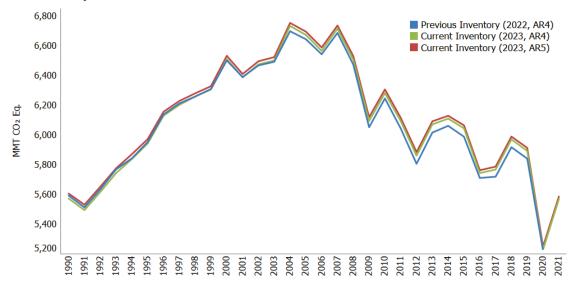


Figure 9-2: Impacts from Recalculations to U.S. Greenhouse Gas Emissions by Sector, Including Quantitative Change Related to the Use of AR5 GWP Values

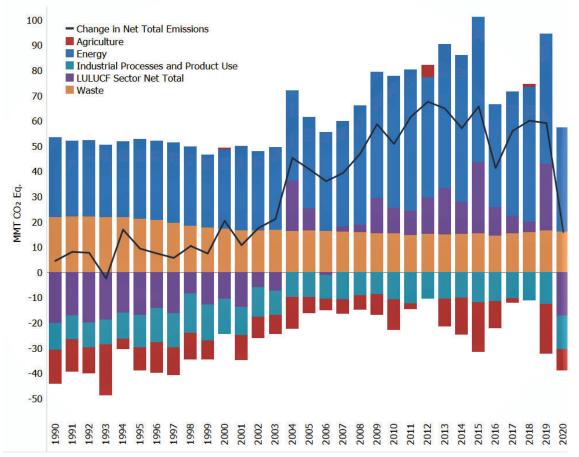


Table 9-1: Revisions to the U.S. Greenhouse Gas Emissions, Including Quantitative Change Related to the Use of AR5 GWP Values (MMT CO₂ Eq.)

				_			Average Annual
Gas/Source	1990	2005	2017	2018	2019	2020	Change
CO ₂	(1.5)	(5.4)	1.2	1.1	3.0	(1.1)	(2.4)
Fossil Fuel Combustion	(3.0)	(4.7)	(0.8)	0.5	3.6	2.2	(2.6)
Electric Power Sector	NC	NC	NC	0.5	0.6	0.6	+
Transportation	NC	NC	0.1	0.1	2.6	0.5	0.1
Industrial	(1.3)	(0.7)	(1.4)	(0.6)	(0.2)	1.6	(0.8)
Residential	(+)	+	+	+	+	(2.7)	(+)
Commercial	(+)	+	(+)	+	+	1.6	(+)
U.S. Territories	(1.7)	(4.0)	0.5	0.5	0.6	0.6	(1.9)
Non-Energy Use of Fuels	0.2	(+)	0.2	0.6	0.8	(1.8)	0.2
Iron and Steel Production & Metallurgical Coke							
Production	0.3	0.1	0.7	0.4	(0.2)	1.1	0.2
Cement Production	NC	NC	0.2	0.2	NC	(+)	+
Natural Gas Systems	NC	NC	NC	NC	NC	NC	NC
Petrochemical Production	NC	NC	NC	NC	NC	(0.2)	NC
Petroleum Systems	(0.1)	(1.8)	(0.6)	(1.2)	0.2	(1.1)	(1.2)
Incineration of Waste	(+)	(+)	NC	NC	NC	(0.2)	(+)
Ammonia Production	1.4	1.1	1.4	0.5	0.1	0.3	1.0
Lime Production	NC	NC	NC	NC	NC	NC	NC
Other Process Uses of Carbonates	NC	NC	NC	NC	(1.4)	(1.4)	(+)
Urea Fertilization	NC	NC	(+)	(0.1)	(0.1)	(0.2)	(+)
Carbon Dioxide Consumption	NC	NC		NC	NC	NC	NC
Urea Consumption for Non-Agricultural							
Purposes	NC	NC	(+)	0.1	0.1	(0.2)	+
Liming	+	+		(+)	(0.2)	0.5	(+)
Coal Mining	NC	NC	0.1	0.1	+	+	+
Glass Production	(0.4)	(+)	(+)	+	+	+	(+)
Soda Ash Production	NC	NC NC	NC	NC	NC	NC	NC
Ferroalloy Production	NC	NC		NC	NC	NC	+
Aluminum Production	NC	NC		+	(+)	NC	+
Titanium Dioxide Production	NC	NC		NC	NC	(0.1)	NC
Zinc Production	NC	NC	NC	NC	NC	(+)	NC
Phosphoric Acid Production	NC	NC		NC	NC	(+)	NC
Lead Production	NC	NC	NC	+	+	(+)	+
Carbide Production and Consumption	NC	NC	NC	NC	+	+	+
Abandoned Oil and Gas Wells	+	+		+	+	+	+
Substitution of Ozone Depleting Substances	+*	+*	+*	+*	+*	+*	+*
Magnesium Production and Processing	NC	NC		NC	NC	NC	NC
Biomass and Biodiesel Consumption	18.5	14.7		16.2	15.8	13.9	15.8
International Bunker Fuels ^b	NC	NC		2.1	(2.5)	NC	(+)
CH ₄ c	87.8	93.6		102.9	99.0	91.8	95.0
Enteric Fermentation	19.6	20.2		21.1	21.1	21.0	20.4
Natural Gas Systems	19.5	25.8		22.5	21.5	20.4	24.2
Landfills	21.2	16.2		15.0	15.4	15.4	16.9
Manure Management	4.2	5.9		7.1	7.0	7.1	5.7
Petroleum Systems	3.5	9.6		22.0	19.5	14.2	10.9
Coal Mining	3.5 11.6	7.7		6.4	5.6	5.0	8.4
Wastewater Treatment	2.4	2.5		3.1	3.1	3.1	2.6

	_	_					
Stationary Combustion	1.0	0.9	0.9	1.0	1.1	0.8	1.0
Abandoned Oil and Gas Wells	1.2	1.3	1.3	1.3	1.3	1.3	1.3
Abandoned Underground Coal Mines	0.9	0.8	0.8	0.7	0.7	0.7	0.9
Mobile Combustion	0.7	0.4	0.4	0.4	0.4	0.4	0.5
Composting	+	0.2	0.3	0.3	0.3	0.3	0.2
Field Burning of Agricultural Residues	+	0.1	0.1	0.1	0.1	0.1	+
Petrochemical Production	+	+	+	+	+	+	+
Anaerobic Digestion at Biogas Facilities	+	+	+	+	+	+	+
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and Consumption	+	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke							
Production	+	+	+	+	+	+	+
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels ^b	+	+	+	+	+	+	+
N ₂ O ^c	(44.2)	(37.5)	(29.9)	(27.5)	(46.5)	(37.2)	(39.1)
Agricultural Soil Management	(28.1)	(22.3)	(17.7)	(15.1)	(35.9)	(25.7)	(24.5)
Stationary Combustion	(2.8)	(3.8)	(3.1)	(3.1)	(2.7)	(2.6)	(3.3)
Wastewater Treatment	(1.8)	(2.2)	(2.6)	(2.4)	(2.1)	(2.7)	(2.2)
Manure Management	(1.5)	(1.8)	(2.1)	(2.1)	(2.2)	(2.2)	(1.8)
Mobile Combustion	(6.2)	(4.3)	(1.6)	(1.6)	(0.9)	(1.3)	(4.2)
Nitric Acid Production	(1.3)	(1.3)	(1.0)	(1.1)	(1.1)	(1.0)	(1.3)
Adipic Acid Production	(1.7)	(0.8)	(0.8)	(1.2)	(0.6)	(0.9)	(0.9)
N₂O from Product Uses	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)
Composting	(+)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Caprolactam, Glyoxal, and Glyoxylic Acid	(5.5)	(2.2)	()	()	()		()
Production	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(+)	(0.2)
Incineration of Waste	(0.1)	(+)	(+)	(+)	(+)	(+)	(+)
Electronics Industry	+	(+)	(+)	(+)	(+)	(+)	(+)
Field Burning of Agricultural Residues	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Petroleum Systems	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Natural Gas Systems	(+)	(+)	(+)	(+)	(+)	(+)	(+)
International Bunker Fuels ^b	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
HFCs, PFCs, SF ₆ and NF ₃	(8.2)	(8.1)	(9.4)	(9.2)	(9.2)	(9.0)	(9.3)
HFCs	(7.5)	(11.1)	(10.3)	(10.2)	(10.5)	(10.6)	(10.2)
Substitution of Ozone Depleting Substances	+	(7.8)	(9.4)	(9.5)	(9.8)	(10.1)	(6.5)
HCFC-22 Production	(7.5)	(3.2)	(0.8)	(0.5)	(0.6)	(0.3)	(3.7)
Electronics Industry	(+)	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(+)
Magnesium Production and Processing	NC (2.4)	NC (a.c.)	(+)	(+)	(+)	(+)	(+)
PFCs	(2.4)	(0.6)	(0.4)	(0.5)	(0.6)	(0.5)	(1.1)
Electronics Industry	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.4)
Aluminum Production	(2.2)	(0.3)	(0.1)	(0.2)	(0.3)	(0.2)	(0.7)
Substitution of Ozone Depleting Substances	NC	(+)	(+)	(+)	(+)	(+)	(+)
Electrical Transmission and Distribution	NC	(+)	+	NC	(+)	(+)	(+)
SF ₆	1.7	3.7	1.4	1.4	1.9	2.1	2.0
Electrical Transmission and Distribution	1.5	3.5	1.3	1.4	1.9	2.1	1.9
Magnesium Production and Processing	0.2	0.1	+	+	+	+	0.1
Electronics Industry	+	0.1	+	+	+	+	+
NF ₃	(+)	(0.1)	(+)	(+)	(+)	(+)	(+)
Electronics Industry	(+)	(0.1)	(+)	(+)	(+)	(+)	(+)
Total Gross Emissions Percent Change in Total Emissions	33.9 0.5%	42.5 0.6%	60.8 0.9%	67.3 1.0%	46.2 0.7%	44.6 0.7%	44.1 0.6%
Change in LULUCF Sector Net Total ^d	(20.3)	8.7	7.0	4.1	26.4	(17.2)	(0.9)
Net Emissions (Sources and Sinks)	13.6	51.2	67.9	71.5	72.6	27.4	43.2
Percent Change in Net Emissions	0.2%	0.8%	1.2%	1.2%	1.2%	0.5%	0.7%

NC (No Change)

- + Absolute value does not exceed 0.05 MMT CO₂ Eq. or 0.05 percent.
- * Indicates a new source for the current Inventory year. Emissions from new sources are captured in net emissions and percent change totals.
- ^a Emissions from International Bunker Fuels are not included in totals.
- ^b Emissions from Biomass and Biofuel Consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for Land Use, Land-Use Change, and Forestry.
- c LULUCF emissions of CH $_4$ and N $_2$ O are reported separately from gross emissions totals in Table 9-2. LULUCF emissions include the CH $_4$ and N $_2$ O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH $_4$ emissions from Land Converted to Coastal Wetlands; and N $_2$ O emissions from Forest Soils and Settlement Soils.
- ^d The LULUCF Sector Net Total is the net sum of all CH₄ and N₂O emissions to the atmosphere plus net carbon stock changes. More detail on the impacts of recalculations on the LULUCF sector can be found in Table 9-2.
- Notes: Net change in total emissions presented without LULUCF. Parentheses indicate negative values. Totals may not sum due to independent rounding.

Table 9-2: Revisions to U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry, Including Quantitative Change Related to the Use of AR5 GWP Values (MMT CO₂ Eq.)

							Average
Land-Use Category	1990	2005	2017	2018	2019	2020	Annual Change
Forest Land Remaining Forest Land	(46.1)	(21.5)	(25.1)	(28.3)	(6.2)	(41.8)	(30.5)
Changes in Forest Carbon Stocks ^a	(47.5)	(27.0)	(22.4)	(27.3)	(14.5)	(39.4)	(31.9)
Non-CO ₂ Emissions from Forest Fires ^b	1.4	5.5	(2.7)	(0.9)	8.3	(2.3)	1.5
N ₂ O Emissions from Forest Soils ^c	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(+)
Non-CO ₂ Emissions from Drained Organic	(·)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(')
Soils ^d	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Land Converted to Forest Land	0.1	0.6	1.2	1.3	1.3	1.3	0.7
Changes in Forest Carbon Stocks ^e	0.1	0.6	1.2	1.3	1.3	1.3	0.7
	+	+	(+)	(+)	+	(+)	+
Cropland Remaining Cropland	T	T	(+)	(+)	т	(+)	
Changes in Mineral and Organic Soil Carbon Stocks			(.)	(.)		(.)	
	+ 3.0	7 6	(+) 2.3	(+)	+	(+)	+
Land Converted to Cropland		2.6 2.6	2.3	2.4	2.3	2.3 2.3	2.6 2.6
Changes in all Ecosystem Carbon Stocks ^f	3.0			2.4	2.3		
Grassland Remaining Grassland	1.8	2.3	1.6	1.6	1.6	1.5	2.2
Changes in Mineral and Organic Soil	4.0	2.2	4.6	4.6	4.6	4.5	2.2
Carbon Stocks	1.8	2.3	1.6	1.6	1.6	1.5	2.2
Non-CO ₂ Emissions from Grassland Fires ^g	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Land Converted to Grassland	(3.5)	(3.1)	(1.8)	(1.8)	(1.8)	(1.8)	(2.9)
Changes in all Ecosystem Carbon Stocks ^f	(3.5)	(3.1)	(1.8)	(1.8)	(1.8)	(1.8)	(2.9)
Wetlands Remaining Wetlands	26.8	25.9	25.9	25.9	25.9	26.0	26.1
Changes in Organic Soil Carbon Stocks in							
Peatlands	NC	NC	NC	+	+	+	+
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Coastal Wetlands	(8.4)	(7.7)	(8.8)	(8.8)	(8.8)	(8.8)	(6.8)
CH ₄ Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	12.6	11.9	13.1	13.1	13.1	13.1	11.1
N ₂ O Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	(3.6)	(3.6)	(3.7)	(3.7)	(3.7)	(3.7)	(3.6)
Non-CO ₂ Emissions from Peatlands							
Remaining Peatlands	(0.1)	(0.2)	(0.1)	(0.2)	(0.2)	(0.2)	(0.2)
CH ₄ Emissions from Flooded Land							
Remaining Flooded Land	26.4	25.5	25.5	25.5	25.5	25.5	25.7
Land Converted to Wetlands	(3.9)	0.1	0.2	0.2	0.2	(+)	(0.9)
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Land Converted to							
Coastal Wetlands	+	+	+	+	+	NC	+
CH ₄ Emissions from Land Converted to							
Coastal Wetlands	+	+	+	+	+	+	+
Changes in Land Converted to Flooded							
Land	(2.4)	+	0.1	0.1	0.1	(+)	(0.6)
CH ₄ Emissions from Land Converted to							
Flooded Land	(1.5)	+	0.1	0.1	0.1	+	(0.3)
Settlements Remaining Settlements	(0.2)	(0.3)	(0.2)	(0.1)	0.1	(7.9)	(0.5)
Changes in Organic Soil Carbon Stocks	NC	NC	NC	NC	NC	NC	NC
Changes in Settlement Tree Carbon							
Stocks	NC	NC	0.2	0.3	0.5	(6.9)	(0.2)
Changes in Yard Trimming and Food Scrap						. ,	. ,
Carbon Stocks in Landfills	NC	NC	NC	NC	NC	-0.6	(+)
321.221.2121 E011011110						0.0	(-)

N ₂ O Emissions from Settlement Soils ^h	(0.2)	(0.3)	(0.4)	(0.4)	(0.4)	(0.4)	(0.3)
Land Converted to Settlements	1.7	2.2	2.9	3.1	3.2	3.2	2.3
Changes in all Ecosystem Carbon Stocks ^f	1.7	2.2	2.9	3.1	3.2	3.2	2.3
Change in LULUCF Total Net Flux ⁱ	(46.8)	(22.4)	(15.8)	(20.5)	(7.4)	(40.4)	(27.9)
Change in LULUCF Emissions ^j	26.5	31.1	22.9	24.6	33.8	23.1	27.0
Change in LULUCF Sector Net Total ^k	(20.3)	8.7	7.0	4.1	26.4	(17.2)	(0.9)
Percent Change in LULUCF Sector Net Total	-2.4%	1.1%	0.9%	0.5%	3.6%	-2.3%	0.0%

NC (No Change)

- + Absolute value does not exceed 0.05 MMT CO₂ Eq. or 0.05 percent.
- ^a Includes the net changes to carbon stocks stored in all forest ecosystem pools and harvested wood products.
- ^b Estimates include CH₄ and N₂O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^c Estimates include N₂O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- $^{
 m d}$ Estimates include CH $_{
 m 4}$ and N $_{
 m 2}$ O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^e Includes the net changes to carbon stocks stored in all forest ecosystem pools.
- f Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements, respectively. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements, respectively.
- g Estimates include CH₄ and N₂O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.
- ^h Estimates include N₂O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.
- ¹ LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land use conversion categories.
- J LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands; and N₂O emissions from Forest Soils and Settlement Soils.
- ^k The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Table 9-3: Revisions to U.S. Greenhouse Gas Emissions, Excluding Quantitative Change Related to the Use of AR5 GWP Values (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	Average Annual Change
CO ₂	(1.5)	(5.4)	1.2	1.1	3.0	(1.1)	(2.4)
Fossil Fuel Combustion	(3.0)	(4.7)	(0.8)	0.5	3.6	2.2	(2.5)
Electric Power Sector	NC	NC	NC	0.5	0.6	0.6	0.1
Transportation	NC	NC	0.1	0.1	2.6	0.5	0.1
Industrial	(1.3)	(0.7)	(1.4)	(0.6)	(0.2)	1.6	(0.8)
Residential	(+)	+	+	+	+	(2.7)	(0.1)
Commercial	(+)	+	(+)	+	+	1.6	0.1
U.S. Territories	(1.7)	(4.0)	0.5	0.5	0.6	0.6	(1.8)
Non-Energy Use of Fuels	0.2	(+)	0.2	0.6	0.8	(1.8)	0.2
Iron and Steel Production & Metallurgical Coke							
Production	NC	NC	0.2	0.2	NC	(+)	+
Cement Production	NC						
Natural Gas Systems	0.3	0.1	0.7	0.4	(0.2)	1.1	0.2
Petrochemical Production	NC	NC	NC	NC	NC	(0.2)	(+)
Petroleum Systems	(0.1)	(1.8)	(0.6)	(1.2)	0.2	(1.1)	(1.2)

Incineration of Waste	(+)	(+)	NC	NC	NC	(0.2)	(+)
Ammonia Production	1.4	1.1	1.4	0.5	0.1	0.3	1.0
Lime Production	NC	NC	NC	NC	NC	NC	NC
Other Process Uses of Carbonates	NC	NC	NC	NC	(1.4)	(1.4)	(0.1)
Urea Fertilization	NC	NC	(+)	(0.1)	(0.1)	(0.2)	(+)
Carbon Dioxide Consumption	NC	NC	NC	NC	NC	NC	NC
Urea Consumption for Non-Agricultural	140	l lite	110	110	110	110	110
Purposes	NC	NC	(+)	0.1	0.1	(0.2)	(+)
Liming	+	+	(+)	(+)	(0.2)	0.5	+
Coal Mining	NC	NC	0.1	0.1	(0.2)	+	+
Glass Production	(0.4)	(+)	(+)	+	+	+	(+)
Soda Ash Production	NC	NC	NC	NC	NC	NC	NC
Ferroalloy Production	NC	NC	NC NC	NC	NC	NC	+
Aluminum Production	NC	NC	NC NC	+	(+)	NC	+
Titanium Dioxide Production	NC	NC	NC NC	NC	NC	(0.1)	(+)
Zinc Production	NC	NC	NC NC	NC	NC	(+)	(+)
Phosphoric Acid Production	NC	NC	NC NC	NC	NC	(+)	(+)
Lead Production	NC	NC	NC NC	+	+	(+)	(+) +
Carbide Production and Consumption		NC NC				(+) +	+
Abandoned Oil and Gas Wells	NC		NC	NC .	+		
	+	+	+	+	+	+*	+*
Substitution of Ozone Depleting Substances							
Magnesium Production and Processing	(+)	(+)	16.2	+	+ 15.0	12.0	4 1 7
Biomass and Biodiesel Consumption ^a	18.5	14.7	16.2	16.2	15.8	13.9	15.7
International Bunker Fuels ^b	NC (F.O)	NC	NC	2.1	(2.5)	NC	(+)
CH ₄ ^c	(5.9)	9.9	19.2	22.4	18.7	13.8	9.3
Enteric Fermentation	NC (2.0)	NC	NC (0.2)	NC	NC	NC	NC
Natural Gas Systems	(3.9)	4.5	(0.3)	1.9	0.8	0.7	2.5
Landfills	NC	0.4	1.6	1.6	1.7	2.3	0.4
Manure Management	NC (2.2)	NC	NC	NC	NC	NC	+
Petroleum Systems	(2.2)	4.6	16.5	17.4	14.7	9.4	5.7
Coal Mining	NC	+	+	+	(0.1)	+	(+)
Wastewater Treatment	(+)	0.1	0.8	0.9	0.9	0.9	0.3
Rice Cultivation	NC	NC	NC	NC	NC	(+)	(+)
Stationary Combustion	(+)	(+)	+	+	+	(0.1)	(+)
Abandoned Oil and Gas Wells	0.4	0.4	0.5	0.5	0.5	0.5	0.4
Abandoned Underground Coal Mines	NC (2.1)	NC (2.4)	NC	NC	NC	+	+
Mobile Combustion	(0.1)	(0.1)	0.1	0.1	0.1	0.1	+
Composting	NC	NC	NC	NC	(+)	+	+
Field Burning of Agricultural Residues	NC	NC	NC	NC	NC	NC	(+)
Petrochemical Production	NC	NC	NC	NC	NC	(+)	(+)
Anaerobic Digestion at Biogas Facilities	NC	NC	NC	NC	NC	NC	NC
Ferroalloy Production	NC	NC	NC	NC	NC	NC	+
Carbide Production and Consumption	NC	NC	NC	NC	NC	NC	+
Iron and Steel Production & Metallurgical Coke							
Production	NC	NC	NC	NC	NC	(+)	(+)
Incineration of Waste	NC	NC	NC	NC	NC	(+)	(+)
International Bunker Fuels ^b	NC	NC	NC	NC	NC	NC	NC
N ₂ O ^c	5.7	12.7	19.3	23.2	4.1	10.0	11.2
Agricultural Soil Management	6.9	12.4	18.7	22.4	2.3	9.3	10.9
Stationary Combustion	(+)	(+)	+	+	+	(+)	(+)
Wastewater Treatment	(+)	(+)	+	0.2	0.5	(+)	+
Manure Management	NC	NC	NC	NC	NC	NC	NC
Mobile Combustion	(1.2)	0.2	0.6	0.5	1.3	0.7	0.3
Nitric Acid Production	NC	NC	NC	NC	NC	NC	NC

Adipic Acid Production	NC	NC	NC	NC	NC	NC	NC
N₂O from Product Uses	NC	NC	NC	NC	NC	NC	NC
Composting	NC	NC	NC	NC	(+)	+	+
Caprolactam, Glyoxal, and Glyoxylic Acid							
Production	NC	NC	NC	NC	NC	0.1	+
Incineration of Waste	NC	NC	NC	NC	NC	(+)	(+)
Electronics Industry	+	+	+	+	+	(+)	+
Field Burning of Agricultural Residues	NC	NC	NC	NC	NC	NC	(+)
Petroleum Systems	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Natural Gas Systems	+	+	(+)	(+)	(+)	(+)	(+)
International Bunker Fuels ^b	NC	NC	NC	NC	(+)	NC	(+)
HFCs, PFCs, SF ₆ and NF ₃	0.8	3.2	1.1	1.2	1.5	1.9	1.5
HFCs	+	(0.1)	(0.1)	(+)	(+)	+	(0.1)
Substitution of Ozone Depleting Substances	NC	(0.1)	(0.1)	(+)	(+)	(+)	(0.1)
HCFC-22 Production	NC	NC	NC	NC	NC	NC	NC
Electronics Industry	+	+	+	+	+	+	+
Magnesium Production and Processing	NC	NC	NC	NC	+	NC	+
PFCs	+	(+)	+	(0.1)	(0.2)	(0.1)	(+)
Electronics Industry	+	(+)	+	(+)	+	(+)	(+)
Aluminum Production	NC	+	+	(0.1)	(0.2)	(0.1)	(+)
Substitution of Ozone Depleting Substances	NC	NC	NC	NC	NC	NC	NC
Electrical Transmission and Distribution	NC	(+)	+	NC	NC	NC	(+)
SF ₆	0.8	3.3	1.2	1.3	1.7	1.9	1.6
Electrical Transmission and Distribution	0.8	3.2	1.2	1.3	1.7	1.9	1.6
Magnesium Production and Processing	NC	+	NC	NC	NC	(+)	+
Electronics Industry	NC	0.1	(+)	(+)	(+)	+	+
NF ₃	NC	(+)	+	(+)	(+)	(+)	(+)
Electronics Industry	NC	(+)	+	(+)	(+)	(+)	(+)
Total Gross Emissions	(0.9)	20.3	40.9	47.9	27.3	24.6	19.6
Percentage Change in Total Emissions	0.0%	0.3%	0.6%	0.7%	0.4%	0.4%	0.3%
Change in LULUCF Sector Net Totald	(23.1)	(6.2)	4.2	1.5	23.9	(20.1)	(3.5)
Net Emissions (Sources and Sinks)	(24.0)	26.4	45.1	49.4	51.2	4.5	16.1
Percent Change in Net Emissions	-0.4%	0.4%	0.8%	0.8%	0.9%	0.1%	0.3%
NC (Na Channa)							

NC (No Change)

Notes: Net change in total emissions presented without LULUCF. Parentheses indicate negative values. Totals may not sum due to independent rounding.

⁺ Absolute value does not exceed 0.05 MMT CO₂ Eq. or 0.05 percent.

^{*} Indicates a new source for the current Inventory year. Emissions from new sources are captured in net emissions and percent change totals.

^a Emissions from International Bunker Fuels are not included in totals.

^b Emissions from Biomass and Biofuel Consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for Land Use, Land-Use Change, and Forestry.

 $^{^{\}rm c}$ LULUCF emissions of CH $_4$ and N $_2$ O are reported separately from gross emissions totals in Table 9-2. LULUCF emissions include the CH $_4$ and N $_2$ O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH $_4$ emissions from Land Converted to Coastal Wetlands; and N $_2$ O emissions from forest soils and settlement soils.

d The LULUCF Sector Net Total is the net sum of all CH₄ and N₂O emissions to the atmosphere plus net carbon stock changes. More detail on the impacts of recalculations on the LULUCF sector can be found in Table 9-4.

Table 9-4: Revisions to U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry, Excluding Quantitative Change Related to the Use of AR5 GWP Values (MMT CO₂ Eq.)

	1990 (45.7)	2005	2017	2018	2019	2020	Annua
Forest Land Remaining Forest Land Changes in Forest Carbon Stocksa (Non-CO2 Emissions from Forest Firesb N2O Emissions from Forest Soilsc Non-CO2 Emissions from Drained Organic Soilsd Land Converted to Forest Land Changes in Forest Carbon Stocksc Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocksf Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO2 Emissions from Grassland Firesg Land Converted to Grassland Changes in all Ecosystem Carbon Stocksf Wetlands Remaining Wetlands							Chang
Changes in Forest Carbon Stocks ^a Non-CO ₂ Emissions from Forest Fires ^b N ₂ O Emissions from Forest Soils ^c Non-CO ₂ Emissions from Drained Organic Soils ^d Land Converted to Forest Land Changes in Forest Carbon Stocks ^e Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocks ^f Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	1 1 1 1 1	(20.1)	(23.5)	(27.1)	(5.7)	(39.5)	(29.6
Non-CO ₂ Emissions from Forest Fires ^b N ₂ O Emissions from Forest Soils ^c Non-CO ₂ Emissions from Drained Organic Soils ^d Land Converted to Forest Land Changes in Forest Carbon Stocks ^e Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocks ^f Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	(47.5)	(27.0)	(22.4)	(27.3)	(14.5)	(39.4)	(31.9
N ₂ O Emissions from Forest Soils ^c Non-CO ₂ Emissions from Drained Organic Soils ^d Land Converted to Forest Land Changes in Forest Carbon Stocks ^e Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocks ^f Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	1.7	6.7	(1.3)	0.1	8.6	(0.3)	2.
Non-CO ₂ Emissions from Drained Organic Soils ^d Land Converted to Forest Land Changes in Forest Carbon Stocks ^e Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocks Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks Mon-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks Wetlands Remaining Wetlands	+	0.1	0.1	0.1	0.1	0.1	0
Soils ^d Land Converted to Forest Land Changes in Forest Carbon Stocks ^e Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocks Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks Wetlands Remaining Wetlands		0.1	0.1	0.1	0.1	0.1	·
Changes in Forest Carbon Stockse Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocksf Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Firese Land Converted to Grassland Changes in all Ecosystem Carbon Stocksf Wetlands Remaining Wetlands	0.1	0.1	0.1	0.1	0.1	0.1	0
Changes in Forest Carbon Stockse Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stockse Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Firese Land Converted to Grassland Changes in all Ecosystem Carbon Stocksf Wetlands Remaining Wetlands	0.1	0.6	1.2	1.3	1.3	1.3	0
Cropland Remaining Cropland Changes in Mineral and Organic Soil Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocks Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires Land Converted to Grassland Changes in all Ecosystem Carbon Stocks Metlands Remaining Wetlands	0.1	0.6	1.2	1.3	1.3	1.3	0
Changes in Mineral and Organic Soil Carbon Stocks and Converted to Cropland Changes in all Ecosystem Carbon Stocks Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires and Converted to Grassland Changes in all Ecosystem Carbon Stocks Vetlands Remaining Wetlands	+	+	(+)	(+)	+	(+)	U
Carbon Stocks Land Converted to Cropland Changes in all Ecosystem Carbon Stocksf Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Firesg Land Converted to Grassland Changes in all Ecosystem Carbon Stocksf Wetlands Remaining Wetlands	т	, T	(+)	(+)		(+)	
Changes in all Ecosystem Carbon Stocksf Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Firesg and Converted to Grassland Changes in all Ecosystem Carbon Stocksf Wetlands Remaining Wetlands			/.\	(.)		(.)	
Changes in all Ecosystem Carbon Stocks ^f Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	+	+	(+)	(+)	+	(+)	,
Grassland Remaining Grassland Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	3.0	2.6	2.3	2.4	2.3	2.3	2
Changes in Mineral and Organic Soil Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	3.0	2.6	2.3	2.4	2.3	2.3	2
Carbon Stocks Non-CO ₂ Emissions from Grassland Fires ^g .and Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	1.8	2.4	1.7	1.7	1.6	1.6	2
Non-CO ₂ Emissions from Grassland Fires ^g Land Converted to Grassland Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands							
Land Converted to Grassland Changes in all Ecosystem Carbon Stocksf Wetlands Remaining Wetlands	1.8	2.3	1.6	1.6	1.6	1.5	2
Changes in all Ecosystem Carbon Stocks ^f Wetlands Remaining Wetlands	+	0.1	0.1	0.1	0.1	0.1	0
Wetlands Remaining Wetlands	(3.5)	(3.1)	(1.8)	(1.8)	(1.8)	(1.8)	(2.
_	(3.5)	(3.1)	(1.8)	(1.8)	(1.8)	(1.8)	(2.
Changes in Organic Soil Carbon Stocks in	24.2	23.1	23.1	23.1	23.1	23.2	23
Peatlands	NC	NC	NC	+	+	+	
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Coastal Wetlands	+	(0.1)	+	+	+	+	
CH ₄ Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	NC	NC	NC	NC	NC	NC	1
N ₂ O Emissions from Coastal Wetlands							
Remaining Coastal Wetlands	+	+	+	+	+	+	
Non-CO ₂ Emissions from Peatlands							
Remaining Peatlands	+	+	+	+	+	+	
CH ₄ Emissions from Flooded Land							
Remaining Flooded Land	24.2	23.1	23.1	23.1	23.1	23.1	23
and Converted to Wetlands	(4.2)	+	0.1	0.1	0.1	(+)	(1.
Changes in Biomass, DOM, and Soil							
Carbon Stocks in Land Converted to							
Coastal Wetlands	+	+	+	+	+	NC	
CH ₄ Emissions from Land Converted to							
Coastal Wetlands	NC	NC	NC	NC	NC	NC	1
Changes in Land Converted to Flooded							
Land	(2.4)	+	0.1	0.1	0.1	(+)	(0.
CH ₄ Emissions from Land Converted to	(= /		0.2	0.2	0.2	(-)	(0.
Flooded Land	(1.8)	+	0.1	0.1	0.1	(+)	(0.
Settlements Remaining Settlements	0.4	0.6	0.5	0.6	0.8	(7.2)	0
Changes in Organic Soil Carbon Stocks	NC	NC	NC	NC	NC	NC	1
Changes in Settlement Tree Carbon	140	INC	INC	INC	INC	INC	
Stocks							
Changes in Yard Trimming and Food Scrap	NC	NC	0.2	ОЭ	0 5	(6.0)	10
Carbon Stocks in Landfills	NC	NC	0.2	0.3	0.5	(6.9)	(0.

N ₂ O Emissions from Settlement Soilsh	0.4	0.6	0.3	0.3	0.3	0.3	0.5
Land Converted to Settlements	1.7	2.2	2.9	3.1	3.2	3.2	2.3
Changes in all Ecosystem Carbon Stocksf	1.7	2.2	2.9	3.1	3.2	3.2	2.3
Change in LULUCF Total Net Flux ⁱ	(46.8)	(22.4)	(15.8)	(20.5)	(7.4)	(40.4)	(27.9)
Change in LULUCF Emissions ^j	24.6	30.7	22.4	23.8	32.3	23.4	25.9
Change in LULUCF Sector Net Total ^k	(22.2)	8.3	6.6	3.3	24.9	(17.0)	(2.0)
Percent Change in LULUCF Sector Net Total	-2.6%	1.1%	0.4%	0.4%	3.4%	-2.2%	-0.1%

NC (No Change)

- + Absolute value does not exceed 0.05 MMT CO₂ Eq. or 0.05 percent.
- ^a Includes the net changes to carbon stocks stored in all forest ecosystem pools and harvested wood products.
- ^b Estimates include CH₄ and N₂O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^c Estimates include N₂O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- $^{
 m d}$ Estimates include CH $_{
 m 4}$ and N $_{
 m 2}$ O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.
- ^e Includes the net changes to carbon stocks stored in all forest ecosystem pools.
- f Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements, respectively. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements, respectively.
- g Estimates include CH₄ and N₂O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.
- ^h Estimates include N₂O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.
- ¹ LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land use conversion categories.
- J LULUCF emissions include the CH₄ and N₂O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH₄ emissions from Land Converted to Coastal Wetlands; and N₂O emissions from forest soils and settlement soils.
- ^k The LULUCF Sector Net Total is the net sum of all LULUCF CH₄ and N₂O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

10. References and Abbreviations

Executive Summary

BEA (2022) 2021 Comprehensive Revision of the National Income and Product Accounts: Current-dollar and "real" GDP, 1929–2021. Bureau of Economic Analysis (BEA), U.S. Department of Commerce, Washington, D.C. Available online at: http://www.bea.gov/national/index.htm#gdp.

EIA (2023) Electricity Generation. Monthly Energy Review, February 2023. Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0035(2023/02).

https://www.eia.gov/energyexplained/index.php?page=electricity in the united states.

IEA (2022) CO₂ Emissions from Fossil Fuel Combustion – Overview. International Energy Agency. Available online at: https://www.iea.org/subscribe-to-data-services/co2-emissions-statistics.

IPCC (2021) Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)]. Cambridge University Press. In Press.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. e [Buendia, E., Guendehou S., Limmeechokachai B., Pipatti R., Rojas Y., Sturgiss R., Tanabe K., Wirth T., (eds.)]. Cambridge University Press. In Press.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K., Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

NOAA/ESRL (2023a) Trends in Atmospheric Carbon Dioxide. Available online at: https://gml.noaa.gov/ccgg/trends/. 05 January 2023.

NOAA/ESRL (2023b) *Trends in Atmospheric Methane*. Available online at: https://gml.noaa.gov/ccgg/trends ch4/. 05 January 2023.

NOAA/ESRL (2023c) Nitrous Oxide (N_2O) hemispheric and global monthly means from the NOAA/ESRL Chromatograph for Atmospheric Trace Species data from baseline observatories (Barrow, Alaska; Summit, Greenland; Niwot Ridge, Colorado; Mauna Loa, Hawaii; American Samoa; South Pole). Available online at: https://www.esrl.noaa.gov/gmd/ccgg/trends_n2o/. 05 January 2022.

UNFCCC (2014) Report of the Conference of the Parties on its Nineteenth Session, Held in Warsaw from 11 to 23 November 2013. (FCCC/CP/2013/10/Add.3). January 31, 2014. Available online at: http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

U.S. Census Bureau (2022) U.S. Census Bureau International Database (IDB). Available online at: https://www.census.gov/programs-surveys/international-programs.html.

Introduction

IPCC (2021) Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press. In Press

IPCC (2014) Climate Change 2014: Mitigation of Climate Change. Contribution of Working Group III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Edenhofer, O., R. Pichs-Madruga, Y. Sokona, J. Minx, E. Farahani, S. Kadner, K. Seyboth, A. Adler, I. Baum, S. Brunner, P. Eickemeier, B. Kriemann, J. Savolainen, S. Schlomer, C. von Stechow, and T. Zwickel (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1435 pp.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2001) Climate Change 2001: The Scientific Basis. Intergovernmental Panel on Climate Change. [J.T. Houghton, Y. Ding, D.J. Griggs, M. Noguer, P.J. van der Linden, X. Dai, C.A. Johnson, and K. Maskell (eds.)]. Cambridge University Press. Cambridge, United Kingdom.

IPCC/TEAP (2005) *Special Report: Safeguarding the Ozone Layer and the Global Climate System, Chapter 4: Refrigeration.* 2005. Available online at: https://www.ipcc.ch/site/assets/uploads/2018/03/sroc04-1.pdf.

NOAA (2017) Vital Signs of the Planet. Available online at: http://climate.nasa.gov/causes/. Accessed on 9 January 2017.

NOAA/ESRL (2023a) *Trends in Atmospheric Carbon Dioxide*. Available online at: https://gml.noaa.gov/ccgg/trends/gr.html. February 2, 2023.

NOAA/ESRL (2023b) Trends in Atmospheric Methane. Available online at: https://gml.noaa.gov/ccgg/trends_ch4/. February 2, 2023.

NOAA/ESRL (2023c) Trends in Atmospheric Nitrous Oxide. Available online at: https://gml.noaa.gov/ccgg/trends n2o/. February 2, 2023.

NOAA/ESRL (2023d) Trends in Atmospheric Sulfur Hexafluoride. Available online at: https://gml.noaa.gov/ccgg/trends sf6/. February 2, 2023.

UNEP/WMO (1999) Information Unit on Climate Change. Framework Convention on Climate Change. Available online at: http://unfccc.int.

UNFCCC (2014) Report of the Conference of the Parties on its nineteenth session, held in Warsaw from 11 to 23 November 2013. (FCCC/CP/2013/10/Add.3). January 31, 2014. Available online at: http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

USGCRP (2017) Climate Science Special Report: Fourth National Climate Assessment, Volume I. [Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, 470 pp, doi: 10.7930/J0J964J6. Available online at: https://science2017.globalchange.gov/.

WMO/UNEP (2018) Scientific Assessment of Ozone Depletion: 2018. Available online at: https://csl.noaa.gov/assessments/ozone/2018.

Trends in Greenhouse Gas Emissions

BEA (2022) 2021 Comprehensive Revision of the National Income and Product Accounts: Current-dollar and "real" GDP, 1929–2021. Bureau of Economic Analysis (BEA), U.S. Department of Commerce, Washington, D.C. Available online at: http://www.bea.gov/national/index.htm#gdp.

EIA (2023) Monthly Energy Review, February 2023. Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0035(2023/02).

EIA (1991 through 2022) Fuel Oil and Kerosene Sales. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: http://www.eia.gov/petroleum/fueloilkerosene.

EPA (2023) "Criteria pollutants National Tier 1 for 1970 - 2022." National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data. Office of Air Quality Planning and Standards, March 2023. Available online at: https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data

IPCC (2021) Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)]. Cambridge University Press. In Press.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. [Buendia, E., Guendehou S., Limmeechokachai B., Pipatti R., Rojas Y., Sturgiss R., Tanabe K., Wirth T., (eds.)]. Cambridge University Press. In Press.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K., Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

U.S. Census Bureau (2022) U.S. Census Bureau International Database (IDB). Available online at: https://www.census.gov/programs-surveys/international-programs.html.

U.S. Department of Agriculture, National Agricultural Statistics Service (USDA/NASS) (2022) Farm Production Expenditures Annual Summary. National Agricultural Statistics Service, U.S. Department of Agriculture, Washington DC. Available online at: https://usda.library.cornell.edu/concern/publications/gz20ss48r?locale=en.

Energy

EIA (2022) *Monthly Energy Review, November 2022,* Energy Information Administration, U.S. Department of Energy, Washington, DC. DOE/EIA-0035(2019/11).

IEA (2022) Energy related CO₂ emissions, 1990-2021, International Energy Agency, Paris. Available online at: https://www.iea.org/data-and-statistics/charts/global-energy-related-co2-emissions-1990-2021.

Carbon Dioxide Emissions from Fossil Fuel Combustion

AAR (2008 through 2022) *Railroad Facts*. Policy and Economics Department, Association of American Railroads, Washington, D.C. Private communication with Dan Keen.

AISI (2004 through 2021) Annual Statistical Report, American Iron and Steel Institute, Washington, D.C.

APTA (2007 through 2020) *Public Transportation Fact Book.* American Public Transportation Association, Washington, D.C. Available online at: http://www.apta.com/resources/statistics/Pages/transitstats.aspx.

APTA (2006) Commuter Rail National Totals. American Public Transportation Association, Washington, D.C.

BEA (2022) *Table 1.1.6. Real Gross Domestic Product, Chained 2012 Dollars*. Bureau of Economic Analysis (BEA), U.S. Department of Commerce, Washington, D.C. February 2021. Available online at: <a href="https://apps.bea.gov/iTable/?reqid=19&step=3&isuri=1&select_all_years=0&nipa_table_list=6&series=a&first_year=1950&last_year=1959&scale=-9&categories=survey&thetable="https://apps.bea.gov/iTable/?reqid=19&step=3&isuri=1&select_all_years=0&nipa_table_list=6&series=a&first_year=1950&last_year=1959&scale=-9&categories=survey&thetable=

BEA (1991 through 2015) Unpublished BE-36 survey data. Bureau of Economic Analysis, U.S. Department of Commerce. Washington, D.C.

Benson, D. (2002 through 2004) Unpublished data. Upper Great Plains Transportation Institute, North Dakota State University and American Short Line & Regional Railroad Association.

Browning (2022a) Addressing the Time Series Inconsistency in FHWA Data. Memorandum from ICF to Sarah Roberts, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. September 2022.

Browning (2022b) Updated Methodology for Estimating CH₄ and N₂O Emissions from Highway Vehicle Alternative Fuel Vehicles. Memorandum from ICF to Sarah Roberts, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. November 2022.

Browning, L. (2020) GHG Inventory EF Development Using Certification Data. Technical Memo, September 2020.

Browning, L. (2019) Updated On-highway CH₄ and N₂O Emission Factors for GHG Inventory. Memorandum from ICF to Sarah Roberts, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. September 2019.

Browning, L. (2018a) Updated Methodology for Estimating Electricity Use from Highway Plug-In Electric Vehicles. Technical Memo, October 2018.

Browning, L. (2018b) Updated Non-Highway CH₄ and N₂O Emission Factors for U.S. GHG Inventory. Technical Memo, November 2018.

Browning, L. (2017) Updated Methodology for Estimating CH₄ and N₂O Emissions from Highway Vehicle Alternative Fuel Vehicles. Technical Memo, October 2017.

Coffeyville Resources Nitrogen Fertilizers (2012) Nitrogen Fertilizer Operations. Available online at: http://coffeyvillegroup.com/NitrogenFertilizerOperations/index.html.

Dakota Gasification Company (2006) CO₂ Pipeline Route and Designation Information. Bismarck, ND.

DHS (2008) Email Communication. Elissa Kay, Department of Homeland Security and Joe Aamidor, ICF International. January 11, 2008.

DLA Energy (2022) Unpublished data from the Fuels Automated System (FAS). Defense Logistics Agency Energy, U.S. Department of Defense. Washington, D.C.

DOC (1991 through 2022) Unpublished Report of Bunker Fuel Oil Laden on Vessels Cleared for Foreign Countries. Form-563. Foreign Trade Division, Bureau of the Census, U.S. Department of Commerce. Washington, D.C.

DOE (1991 through 2020) Transportation Energy Data Book. Edition 40. Office of Transportation Technologies, Center for Transportation Analysis, Energy Division, Oak Ridge National Laboratory. ORNL-6978. Personal Communication between Stacy Davis (DOE) and Deep Shah (ICF) for sharing selected tables from the pre-release version.

DOE (2012) 2010 Worldwide Gasification Database. National Energy Technology Laboratory and Gasification Technologies Council. Available online at:

http://www.netl.doe.gov/technologies/coalpower/gasification/worlddatabase/index.html. Accessed on 15 March 2012.

DOT (1991 through 2022) Airline Fuel Cost and Consumption. U.S. Department of Transportation, Bureau of Transportation Statistics, Washington, D.C. DAI-10. Available online at: http://www.transtats.bts.gov/fuel.asp.

Eastman Gasification Services Company (2011) Project Data on Eastman Chemical Company's Chemicals-from-Coal Complex in Kingsport, TN.

EIA (2023a) Monthly Energy Review, February 2023, Energy Information Administration, U.S. Department of Energy, Washington, DC. DOE/EIA-0035 (2023/02).

EIA (2023b) International Energy Statistics 1980-2021. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: https://www.eia.gov/beta/international/.

EIA (2023c) Quarterly Coal Report: January - September 2022. Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE/EIA-0121.

EIA (2023d) Natural Gas Annual 2021. Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE/EIA-0131(20).

EIA (2022a) Electric Power Annual 2021. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: https://www.eia.gov/electricity/annual/.

EIA (2022b) Form EIA-923 detailed data with previous form data (EIA-906/920), Energy Information Administration, U.S. Department of Energy. Washington, DC. DOE/EIA. October 2022.

EIA (2022c) Annual Coal Report 2021. Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE/EIA-0584.

EIA (2022d) "Energy use in homes." *Use of energy explained.* Available online at: https://www.eia.gov/energyexplained/use-of-energy/homes.php.

EIA (2020a) Glossary. Energy Information Administration, U.S. Department of Energy, Washington, D.C. Available online at: https://www.eia.gov/tools/glossary/?id=electricity.

EIA (2020b) "Natural gas prices, production, consumption, and exports increased in 2019." *Today in Energy*. Available online at: https://www.eia.gov/todayinenergy/detail.php?id=37892.

EIA (2018) "Both natural gas supply and demand have increased from year-ago levels." Today in Energy. Available online at: https://www.eia.gov/todayinenergy/detail.php?id=37193.

EIA (1991 through 2022) *Fuel Oil and Kerosene Sales*. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: http://www.eia.gov/petroleum/fueloilkerosene.

EIA (2009a) *Emissions of Greenhouse Gases in the United States 2008, Draft Report.* Office of Integrated Analysis and Forecasting, Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE-EIA-0573(2009).

EIA (2009b) *Manufacturing Consumption of Energy (MECS) 2006*. U.S. Department of Energy, Energy Information Administration, Washington, D.C. Released July 2009.

EIA (2008) *Historical Natural Gas Annual, 1930 – 2008*. Energy Information Administration, U.S. Department of Energy. Washington, D.C.

EIA (2007) Personal Communication. Joel Lou, Energy Information Administration and Aaron Beaudette, ICF International. *Residual and Distillate Fuel Oil Consumption for Vessel Bunkering (Both International and Domestic) for American Samoa, U.S. Pacific Islands, and Wake Island*. October 24, 2007.

EIA (2002) *Alternative Fuels Data Tables*. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: https://www.eia.gov/renewable/.

EIA (2001) *U.S. Coal, Domestic and International Issues*. Energy Information Administration, U.S. Department of Energy. Washington, D.C. March 2001.

EIA (1990-2001) *State Energy Data System*. Energy Information Administration, U.S. Department of Energy. Washington, D.C.

Environment and Climate Change Canada (2022) Personal Communication between Environment and Climate Change Canada and Vincent Camobreco for imported CO₂. March 2022.

EPA (2022a) Acid Rain Program Dataset 1996-2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

EPA (2022b) Light-Duty Automotive Technology, Carbon Dioxide Emissions, and Fuel Economy Trends: 1975 - 2020. Office of Transportation and Air Quality, U.S. Environmental Protection Agency. Available online at: https://www.epa.gov/fuel-economy/trends-report.

EPA (2022c) *MOtor Vehicle Emissions Simulator (MOVES3)*. Office of Transportation and Air Quality, U.S. Environmental Protection Agency, Washington, D.C. Available online at: https://www.epa.gov/moves.

EPA (2021c) The Emissions & Generation Resource Integrated Database (eGRID) 2019 Technical Support Document. Clean Air Markets Division, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C. Available Online at: https://www.epa.gov/sites/default/files/2021-02/documents/egrid2019 technical guide.pdf

EPA (2020c) EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Updated Gasoline and Diesel Fuel CO₂ Emission Factors – Memo.EPA (2010) Carbon Content Coefficients Developed for EPA's Mandatory Reporting Rule. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

Dakota. November 3, 2003.

Erickson, T. (2003) Plains CO₂ Reduction (PCOR) Partnership. Presented at the Regional Carbon Sequestration Partnership Meeting Pittsburgh, Pennsylvania, Energy and Environmental Research Center, University of North

FAA (2023) Personal Communication between FAA and John Steller, Mausami Desai, and Vincent Camobreco for aviation emissions estimates from the Aviation Environmental Design Tool (AEDT). February 2023.

FHWA (1996 through 2021) Highway Statistics. Federal Highway Administration, U.S. Department of Transportation, Washington, D.C. Report FHWA-PL-96-023-annual. Available online at: http://www.fhwa.dot.gov/policy/ohpi/hss/hsspubs.htm.

FHWA (2015) Off-Highway and Public-Use Gasoline Consumption Estimation Models Used in the Federal Highway Administration, Publication Number FHWA-PL-17-012. Available online at: https://www.fhwa.dot.gov/policyinformation/pubs/pl17012.pdf.

Fitzpatrick, E. (2002) The Weyburn Project: A Model for International Collaboration.

FRB (2022) Industrial Production and Capacity Utilization. Federal Reserve Statistical Release, G.17, Federal Reserve Board. Available online at: http://www.federalreserve.gov/releases/G17/table1 2.htm.

Gaffney, J. (2007) Email Communication. John Gaffney, American Public Transportation Association and Joe Aamidor, ICF International. December 17, 2007.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom, 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.Marland, G. and A. Pippin (1990) "United States Emissions of Carbon Dioxide to the Earth's Atmosphere by Economic Activity." Energy Systems and Policy, 14(4):323.

SAIC/EIA (2001) Monte Carlo Simulations of Uncertainty in U.S. Greenhouse Gas Emission Estimates. Final Report. Prepared by Science Applications International Corporation (SAIC) for Office of Integrated Analysis and Forecasting, Energy Information Administration, U.S. Department of Energy. Washington, D.C. June 22, 2001.

U.S. Aluminum Association (USAA) (2008 through 2021) U.S. Primary Aluminum Production. U.S. Aluminum Association, Washington, D.C.

USAF (1998) Fuel Logistics Planning. U.S. Air Force: AFPAM23-221. May 1, 1998.

U.S. Census Bureau (2001 through 2011) Current Industrial Reports Fertilizer Materials and Related Products: Annual Summary. Available online at: https://www.census.gov/data/tables/time-series/econ/cir/mg325b.html.

United States Geological Survey (USGS) (2020a) 2020 Mineral Commodity Summaries: Aluminum. U.S. Geological Survey, Reston, VA.

USGS (2021b) 2021 Mineral Commodity Summary: Titanium and Titanium Dioxide. U.S. Geological Survey, Reston, VA.

USGS (2019) 2017 Mineral Yearbook: Aluminum. U.S. Geological Survey, Reston, VA

USGS (2014 through 2021a) Mineral Industry Surveys: Silicon. U.S. Geological Survey, Reston, VA.

USGS (2014 through 2021b) Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA.

USGS (2014 through 2019) *Minerals Yearbook: Nitrogen [Advance Release*]. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/nitrogen/.

USGS (1991 through 2020) Minerals Yearbook - Iron and Steel Scrap. U.S. Geological Survey, Reston, VA.

USGS (1991 through 2015a) *Minerals Yearbook: Manufactured Abrasives Annual Report*. U.S. Geological Survey, Reston, VA. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/abrasives/.

USGS (1991 through 2015b) Minerals Yearbook: Titanium. U.S. Geological Survey, Reston, VA.

USGS (1991 through 2015c) *Minerals Yearbook: Silicon Annual Report*. U.S. Geological Survey, Reston, VA. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/silicon/.

USGS (1996 through 2013) Minerals Yearbook: Silicon. U.S. Geological Survey, Reston, VA.

USGS (1995 through 2013) Minerals Yearbook: Lead Annual Report. U.S. Geological Survey, Reston, VA.

USGS (1995, 1998, 2000, 2001, 2002, 2007) *Minerals Yearbook: Aluminum Annual Report*. U.S. Geological Survey, Reston, VA.

Stationary Combustion (excluding CO₂)

EIA (2023a) *Monthly Energy Review, February 2023*. Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE/EIA-0035(2023/02).

EIA (2023b) *International Energy Statistics 1980-2021*. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: https://www.eia.gov/international/data/world.

EPA (2023) Acid Rain Program Dataset 1996-2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

EPA (2022) *MOtor Vehicle Emissions Simulator (MOVES3)*. Office of Transportation and Air Quality, U.S. Environmental Protection Agency, Washington, D.C. Available online at: https://www.epa.gov/moves.

EPA (1997) Compilation of Air Pollutant Emission Factors, AP-42. Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency. Research Triangle Park, NC. October 1997.

FHWA (1996 through 2022) *Highway Statistics*. Federal Highway Administration, U.S. Department of Transportation, Washington, D.C. Report FHWA-PL-96-023-annual. Available online at: http://www.fhwa.dot.gov/policy/ohpi/hss/hsspubs.htm.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007). Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom, 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.SAIC/EIA (2001) Monte Carlo Simulations of Uncertainty in U.S. Greenhouse Gas Emission Estimates. Final Report. Prepared by Science Applications International Corporation (SAIC) for Office of Integrated Analysis and Forecasting, Energy Information Administration, U.S. Department of Energy. Washington, D.C. June 22, 2001.

Mobile Combustion (excluding CO₂)

AAR (2008 through 2022) *Railroad Facts.* Policy and Economics Department, Association of American Railroads, Washington, D.C. Private communication with Dan Keen.

The Greenhouse Gases, Regulated Emissions, and Energy Use in Transportation Model (GREET2022). Argonne National Laboratory. Available online at: https://greet.es.anl.gov.

APTA (2007 through 2022) *Public Transportation Fact Book.* American Public Transportation Association, Washington, D.C. Available online at: http://www.apta.com/resources/statistics/Pages/transitstats.aspx.

APTA (2006) *Commuter Rail National Totals*. American Public Transportation Association, Washington, D.C. Available online at: http://www.apta.com/research/stats/rail/crsum.cfm.

BEA (1991 through 2015) Unpublished BE-36 survey data. Bureau of Economic Analysis, U.S. Department of Commerce. Washington, D.C.

Benson, D. (2002 through 2004) Personal communication. Unpublished data developed by the Upper Great Plains Transportation Institute, North Dakota State University and American Short Line & Regional Railroad Association.

Browning (2022a) Addressing the Time Series Inconsistency in FHWA Data. Memorandum from ICF to Sarah Roberts, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. September 2022.

Browning (2022b) Updated Methodology for Estimating CH₄ and N₂O Emissions from Highway Vehicle Alternative Fuel Vehicles. Memorandum from ICF to Sarah Roberts, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. November 2022.

Browning (2020a) *GHG Inventory EF Development Using Certification Data*. Memorandum from ICF to Sarah Roberts, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. September 2020.

Browning, L. (2020b). Updated Methane and Nitrous Oxide Emission Factors for Non-Road Sources and On-road Motorcycles. Technical Memorandum from ICF International to Sarah Roberts, Office of Transportation and Air Quality, U.S. Environmental Protection Agency, September 2020.

Browning, L. (2019) Updated On-highway CH₄ and N₂O Emission Factors for GHG Inventory. Memorandum from ICF to Sarah Roberts and Justine Geidosch, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. September 2019.

Browning, L. (2018a). Updated Methodology for Estimating Electricity Use from Highway Plug-In Electric Vehicles. Technical Memorandum from ICF International to Sarah Roberts and Justine Geidosch, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. October 2018.

Browning, L. (2018b) Updated Non-Highway CH_4 and N_2O Emission Factors for U.S. GHG Inventory. Technical Memorandum from ICF International to Sarah Roberts and Justine Geidosch, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. November 2018.

Browning, L. (2017) Updated Methodology for Estimating CH_4 and N_2O Emissions from Highway Vehicle Alternative Fuel Vehicles. Technical Memorandum from ICF International to Sarah Roberts and Justine Geidosch, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. October 2017.

Browning, L. (2009) Personal communication with Lou Browning, "Suggested New Emission Factors for Marine Vessels," ICF International.

Browning, L. (2005) Personal communication with Lou Browning, "Emission control technologies for diesel highway vehicles specialist," ICF International.

DHS (2008) Email Communication. Elissa Kay, Department of Homeland Security and Joe Aamidor, ICF International. January 11, 2008.

DLA Energy (2022) Unpublished data from the Defense Fuels Automated Management System (DFAMS). Defense Energy Support Center, Defense Logistics Agency, U.S. Department of Defense. Washington, D.C.

DOC (1991 through 2022) Unpublished Report of Bunker Fuel Oil Laden on Vessels Cleared for Foreign Countries. Form-563. Foreign Trade Division, Bureau of the Census, U.S. Department of Commerce. Washington, D.C.

DOE (1993 through 2022) *Transportation Energy Data Book Edition 40*. Office of Transportation Technologies, Center for Transportation Analysis, Energy Division, Oak Ridge National Laboratory. Personal Communication between Stacy Davis (DOE) and Deep Shah (ICF) for sharing selected tables from the pre-release version.

DOT (1991 through 2022) Airline *Fuel Cost and Consumption*. U.S. Department of Transportation, Bureau of Transportation Statistics, Washington, D.C. DAI-10. Available online at: http://www.transtats.bts.gov/fuel.asp.

EIA (2022) *Monthly Energy Review, February 2022,* Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0035(2022/02).

EIA (2022f) *Natural Gas Annual 2021*. Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0131(11).

EIA (1991 through 2022) *Fuel Oil and Kerosene Sales.* Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: http://www.eia.gov/petroleum/fueloilkerosene.

EIA (2016) "Table 3.1: World Petroleum Supply and Disposition." *International Energy Annual.* Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: https://www.eia.gov/cfapps/ipdbproject/IEDIndex3.cfm?tid=5&pid=66&aid=13.

EIA (2011) *Annual Energy Review 2010*. Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0384(2011). October 19, 2011.

EIA (2007) Personal Communication. Joel Lou, Energy Information Administration and Aaron Beaudette, ICF International. *Residual and Distillate Fuel Oil Consumption for Vessel Bunkering (Both International and Domestic) for American Samoa, U.S. Pacific Islands, and Wake Island*. October 24, 2007.

EIA (2002) *Alternative Fuels Data Tables*. Energy Information Administration, U.S. Department of Energy, Washington, D.C. Available online at: http://www.eia.doe.gov/fuelrenewable.html.

EPA (2022a) Light-Duty Automotive Technology, Carbon Dioxide Emissions, and Fuel Economy Trends: 1975 - 2020. Office of Transportation and Air Quality, U.S. Environmental Protection Agency. Available online at: https://www.epa.gov/fuel-economy/trends-report.

EPA (2022b) *Motor Vehicle Emissions Simulator (MOVES3)*. Office of Transportation and Air Quality, U.S. Environmental Protection Agency. Available online at: https://www.epa.gov/moves.

EPA (2022c) Confidential Engine Family Sales Data Submitted to EPA by Manufacturers. Office of Transportation and Air Quality, U.S. Environmental Protection Agency.

EPA (2022d) Annual Certification Test Results Report. Office of Transportation and Air Quality, U.S. Environmental Protection Agency. Available online at: https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-test-data-vehicles-and-engines.

EPA (2016g) "1970 - 2015 Average annual emissions, all criteria pollutants in MS Excel." *National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data*. Office of Air Quality Planning and Standards. Available online at: https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data.

EPA (2004) *Mobile6.2 Vehicle Emission Modeling Software*. Office of Mobile Sources, U.S. Environmental Protection Agency, Ann Arbor, Michigan.

EPA (1999a) *Emission Facts: The History of Reducing Tailpipe Emissions.* Office of Mobile Sources. May 1999. EPA 420-F-99-017. Available online at: https://www.epa.gov/nscep.

EPA (1999b) Regulatory Announcement: EPA's Program for Cleaner Vehicles and Cleaner Gasoline. Office of Mobile Sources. December 1999. EPA420-F-99-051. Available online at: https://nepis.epa.gov/Exe/ZyPDF.cgi/P1001Z9W.PDF?Dockey=P1001Z9W.PDF.

EPA (1998) Emissions of Nitrous Oxide from Highway Mobile Sources: Comments on the Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990–1996. Office of Mobile Sources, Assessment and Modeling Division, U.S. Environmental Protection Agency. August 1998. EPA420-R-98-009.

EPA (1994a) Automobile Emissions: An Overview. Office of Mobile Sources. August 1994. EPA 400-F-92-007. Available online at: https://www.epa.gov/nscep.

EPA (1994b) Milestones in Auto Emissions Control. Office of Mobile Sources. August 1994. EPA 400-F-92-014. Available online at: https://www.epa.gov/nscep.

EPA (1993) Automobiles and Carbon Monoxide. Office of Mobile Sources. January 1993. EPA 400-F-92-005. Available online at: https://www.epa.gov/nscep.

Esser, C. (2003 through 2004) Personal Communication with Charles Esser, Residual and Distillate Fuel Oil Consumption for Vessel Bunkering (Both International and Domestic) for American Samoa, U.S. Pacific Islands, and Wake Island.

FAA (2023) Personal Communication between FAA and John Steller, Mausami Desai and Vincent Camobreco for aviation emission estimates from the Aviation Environmental Design Tool (AEDT). March 2023.

FHWA (1996 through 2023) Highway Statistics. Federal Highway Administration, U.S. Department of Transportation, Washington, D.C. Report FHWA-PL-96-023-annual. Available online at: http://www.fhwa.dot.gov/policy/ohpi/hss/hsspubs.htm.

FHWA (2015) Off-Highway and Public-Use Gasoline Consumption Estimation Models Used in the Federal Highway Administration, Publication Number FHWA-PL-17-012. Available online at: https://www.fhwa.dot.gov/policyinformation/pubs/pl17012.pdf.

Gaffney, J. (2007) Email Communication. John Gaffney, American Public Transportation Association and Joe Aamidor, ICF International. December 17, 2007.

HybridCars.com (2019). Monthly Plug-In Electric Vehicle Sales Dashboard, 2010-2018. Available online at https://www.hybridcars.com/december-2017-dashboard/.

ICF (2006a) Revised Gasoline Vehicle EFs for LEV and Tier 2 Emission Levels. Memorandum from ICF International to John Davies, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. November 2006.

ICF (2006b) Revisions to Alternative Fuel Vehicle (AFV) Emission Factors for the U.S. Greenhouse Gas Inventory. Memorandum from ICF International to John Davies, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. November 2006.

ICF (2004) Update of Methane and Nitrous Oxide Emission Factors for On-Highway Vehicles. Final Report to U.S. Environmental Protection Agency. February 2004.

ICF (2017b) Updated Non-Highway CH₄ and N₂O Emission Factors for U.S. GHG Inventory. Memorandum from ICF to Sarah Roberts and Justine Geidosch, Office of Transportation and Air Quality, U.S. Environmental Protection Agency. October 2017.

Lipman, T. and M. Delucchi (2002) "Emissions of Nitrous Oxide and Methane from Conventional and Alternative Fuel Motor Vehicles." Climate Change, 53:477-516.

SAE (2010) Utility Factor Definitions for Plug-In Hybrid Electric Vehicles Using Travel Survey Data. Society of Automotive Engineers. Report J2841, Available online at: https://www.sae.org/standards/content/j2841 201009/.

Raillnc (2014 through 2022) Raillnc Short line and Regional Traffic Index. Carloads Originated Year-to-Date. December 2022. Available online at: https://www.railinc.com/rportal/railinc-indexes.

Santoni, G., B. Lee, E. Wood, S. Herndon, R. Miake-Lye, S. Wofsy, J. McManus, D. Nelson, M. Zahniser (2011) Aircraft emissions of methane and nitrous oxide during the alternative aviation fuel experiment. Environ Sci Technol. 2011 Aug 15; 45(16):7075-82.

U.S. Census Bureau (2000) *Vehicle Inventory and Use Survey*. U.S. Census Bureau, Washington, D.C. Database CD-EC97-VIUS.

Whorton, D. (2006 through 2014) Personal communication, Class II and III Rail energy consumption, American Short Line and Regional Railroad Association.

Zukowski, D. (2022), *More electric buses join transit fleets as costs and technology improve,* SmartCitiesDive, January 31, 2022. Available at https://www.smartcitiesdive.com/news/more-electric-buses-arriving-in-city-transit-fleets/617072/

Carbon Emitted from Non-Energy Uses of Fossil Fuels

ACC (2022a) "U.S. Resin Production & Sales 2021 vs. 2020." Available online at:

https://www.americanchemistry.com/chemistry-in-america/data-industry-statistics/statistics-on-the-plastic-resins-industry

ACC (2022b) "Guide to the Business of Chemistry, 2022," American Chemistry Council. Available online at: https://www.americanchemistry.com/chemistry-in-america/data-industry-statistics/resources/2022-guide-to-the-business-of-chemistry

ACC (2021) "U.S. Resin Production & Sales 2020 vs. 2019." Available online at:

https://www.americanchemistry.com/chemistry-in-america/chemistry-in-everyday-products/plastics

ACC (2020) "U.S. Resin Production & Sales 2019 vs. 2018." Available online at:

https://www.americanchemistry.com/chemistry-in-america/chemistry-in-everyday-products/plastics.

ACC (2019) "U.S. Resin Production & Sales 2018 vs. 2017." Available online at:

https://www.americanchemistry.com/chemistry-in-america/chemistry-in-everyday-products/plastics.

ACC (2018) "U.S. Resin Production & Sales 2017 vs. 2016." Available online at:

https://www.americanchemistry.com/chemistry-in-america/chemistry-in-everyday-products/plastics.

ACC (2017) "U.S. Resin Production & Sales 2016 vs. 2015."

ACC (2016) "U.S. Resin Production & Sales 2015 vs. 2014."

ACC (2015) "PIPS Year-End Resin Statistics for 2014 vs. 2013: Production, Sales and Captive Use." Available online at: https://www.americanchemistry.com/chemistry-in-america/data-industry-statistics/statistics-on-the-plastic-resins-industry/resin-report-subscriptions.

ACC (2014) "U.S. Resin Production & Sales: 2013 vs. 2012," American Chemistry Council. Available online at: http://www.americanchemistry.com/Jobs/EconomicStatistics/Plastics-Statistics/Production-and-Sales-Data-by-Resin.pdf.

ACC (2013) "U.S. Resin Production & Sales: 2012 vs. 2011," American Chemistry Council. Available online at: http://www.americanchemistry.com/Jobs/EconomicStatistics/Plastics-Statistics/Production-and-Sales-Data-by-Resin.pdf.

ACC (2003-2011) "PIPS Year-End Resin Statistics for 2010: Production, Sales and Captive Use." Available online at: http://www.americanchemistry.com/Jobs/EconomicStatistics/Plastics-Statistics/Production-and-Sales-Data-by-Resin.pdf.

Bank of Canada (2022) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/annual-average-exchange-rates/#download.

Bank of Canada (2021) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/annual-average-exchange-rates/#download.

Bank of Canada (2020) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/annual-average-exchange-rates/#download.

Bank of Canada (2019) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/annual-average-exchange-rates/#download.

Bank of Canada (2018) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/annual-average-exchange-rates/.

Bank of Canada (2017) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/legacy-noon-and-closing-rates/.

Bank of Canada (2016) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/legacy-noon-and-closing-rates/.

Bank of Canada (2014) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/legacy-noon-and-closing-rates/.

Bank of Canada (2013) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/legacy-noon-and-closing-rates/.

Bank of Canada (2012) Financial Markets Department Year Average of Exchange Rates. Available online at: https://www.bankofcanada.ca/rates/exchange/legacy-noon-and-closing-rates/.

CIAC (2022). 2022 Economic Review of Chemistry. Available online at: https://canadianchemistry.ca/wpcontent/uploads/2022/06/2022-Economic-Review-of-Chemistry23732 removed.pdf.

EIA (2023) Monthly Energy Review, February 2022. Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0035 (2023/02).

EIA (2021) EIA Manufacturing Consumption of Energy (MECS) 2018. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EIA (2020) Glossary. Energy Information Administration, U.S. Department of Energy, Washington, D.C. Available online at: https://www.eia.gov/tools/glossary/index.php?id=N#nat Gas Liquids.

EIA (2019) Personal communication between EIA and ICF on November 11, 2019.

EIA (2017) EIA Manufacturing Consumption of Energy (MECS) 2014. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EIA (2013) EIA Manufacturing Consumption of Energy (MECS) 2010. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EIA (2010) EIA Manufacturing Consumption of Energy (MECS) 2006. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EIA (2005) EIA Manufacturing Consumption of Energy (MECS) 2002. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EIA (2001) EIA Manufacturing Consumption of Energy (MECS) 1998. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EIA (1997) EIA Manufacturing Consumption of Energy (MECS) 1994. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EIA (1994) EIA Manufacturing Consumption of Energy (MECS) 1991. U.S. Department of Energy, Energy Information Administration, Washington, D.C.

EPA (2022) "Criteria pollutants National Tier 1 for 1970 - 2021." National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data. Office of Air Quality Planning and Standards, February 2022. Available online at: https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data.

EPA (2021) *Resource Conservation and Recovery Act (RCRA) Info*, Biennial Report, GM Form (Section 2- Onsite Management) and WR Form.

EPA (2019) Advancing Sustainable Materials Management: 2016 and 2017 Data Tables. Office of Land and Emergency Management, U.S. Environmental Protection Agency. Washington, D.C. Available online at: https://www.epa.gov/sites/production/files/2019-

11/documents/2016 and 2017 facts and figures data tables 0.pdf.

EPA (2018a) Advancing Sustainable Materials Management: Facts and Figures 2015, Assessing Trends in Material Generation, Recycling and Disposal in the United States. Washington, D.C.

EPA (2018b) *Resource Conservation and Recovery Act (RCRA) Info*, Biennial Report, GM Form (Section 2- Onsite Management) and WR Form.

EPA (2017) EPA's Pesticides Industry Sales and Usage, 2008 – 2012 Market Estimates. Available online at: https://www.epa.gov/sites/production/files/2017-01/documents/pesticides-industry-sales-usage-2016 0.pdf. Accessed September 2017.

EPA (2016a) Advancing Sustainable Materials Management: 2014 Facts and Figures Fact Sheet. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. Available online at: https://www.epa.gov/sites/production/files/2016-11/documents/2014 smmfactsheet 508.pdf.

EPA (2016b) Resource Conservation and Recovery Act (RCRA) Info, Biennial Report, GM Form (Section 2- Onsite Management) and WR Form.

EPA (2015) *Resource Conservation and Recovery Act (RCRA) Info*, Biennial Report, GM Form (Section 2- Onsite Management) and WR Form.

EPA (2014a) Municipal Solid Waste in the United States: 2012 Facts and Figures. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. Available online at: https://www.epa.gov/sites/default/files/2015-09/documents/2012 msw dat tbls.pdf.

EPA (2014b) Chemical Data Access Tool (CDAT). U.S. Environmental Protection Agency, June 2014. Available online at: https://edg.epa.gov/metadata/catalog/search/resource/details.page?uuid=%7B2D73C764-6919-404D-8C9B-61869B3330D6%7D. Accessed January 2015.

EPA (2013a) Municipal Solid Waste in the United States: 2011 Facts and Figures. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. Available online at: http://www.epa.gov/epaoswer/non-hw/muncpl/msw99.htm.

EPA (2013b) *Resource Conservation and Recovery Act (RCRA) Info*, Biennial Report, GM Form (Section 2- Onsite Management) and WR Form.

EPA (2011) EPA's Pesticides Industry Sales and Usage, 2006 and 2007 Market Estimates. Available online at: https://www.epa.gov/pesticides/pesticides-industry-sales-and-usage-2006-and-2007-market-estimates. Accessed January 2012.

EPA (2009) Biennial Reporting System (BRS) Database. U.S. Environmental Protection Agency, Envirofacts Warehouse. Washington, D.C. Available online at: https://www.epa.gov/enviro/br-search. Data for 2001-2007 are current as of Sept. 9, 2009.

EPA (2004) EPA's Pesticides Industry Sales and Usage, 2000 and 2001 Market Estimates. Available online at: https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=3000659P.TXT. Accessed September 2006.

EPA (2002) EPA's Pesticides Industry Sales and Usage, 1998 and 1999 Market Estimates, Table 3.6. Available online at https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=200001G5.TXT. Accessed July 2003.

EPA (2001) AP 42, Volume I, Fifth Edition. Chapter 11: Mineral Products Industry. Available online at: http://www.epa.gov/ttn/chief/ap42/ch11/index.html.

EPA (2000a) Biennial Reporting System (BRS). U.S. Environmental Protection Agency, Envirofacts Warehouse. Washington, D.C. Available online at: https://www.epa.gov/enviro/br-search.

EPA (2000b) Toxics Release Inventory, 1998. U.S. Environmental Protection Agency, Office of Environmental Information, Office of Information Analysis and Access, Washington, D.C. Available online at: https://enviro.epa.gov/triexplorer/tri_release.chemical.

EPA (1999) EPA's Pesticides Industry Sales and Usage, 1996-1997 Market Estimates. Available online at: https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=200001IL.TXT.

EPA (1998) EPA's Pesticides Industry Sales and Usage, 1994-1995 Market Estimates. Available online at: http://www.epa.gov/oppbead1/pestsales/95pestsales/market estimates1995.pdf.

FEB (2013) Fiber Economics Bureau, as cited in C&EN (2013) Lackluster Year for Chemical Output: Production stayed flat or dipped in most world regions in 2012. Chemical & Engineering News, American Chemical Society, 1 July. Available online at: http://www.cen-online.org.

FEB (2012) Fiber Economics Bureau, as cited in C&EN (2012) Too Quiet After the Storm: After a rebound in 2010, chemical production hardly grew in 2011. Chemical & Engineering News, American Chemical Society, 2 July. Available online at: http://www.cen-online.org.

FEB (2011) Fiber Economics Bureau, as cited in C&EN (2011) Output Ramps up in all Regions. Chemical Engineering News, American Chemical Society, 4 July. Available online at: http://www.cen-online.org.

FEB (2010) Fiber Economics Bureau, as cited in C&EN (2010) Output Declines in U.S., Europe. Chemical & Engineering News, American Chemical Society, 6 July. Available online at: http://www.cen-online.org.

FEB (2009) Fiber Economics Bureau, as cited in C&EN (2009) Chemical Output Slipped In Most Regions Chemical & Engineering News, American Chemical Society, 6 July. Available online at: http://www.cen-online.org.

FEB (2007) Fiber Economics Bureau, as cited in C&EN (2007) Gains in Chemical Output Continue. Chemical & Engineering News, American Chemical Society. July 2, 2007. Available online at: http://www.cen-online.org.

FEB (2005) Fiber Economics Bureau, as cited in C&EN (2005) Production: Growth in Most Regions Chemical & Engineering News, American Chemical Society, 11 July. Available online at: http://www.cen-online.org.

FEB (2003) Fiber Economics Bureau, as cited in C&EN (2003) Production Inches Up in Most Countries, Chemical & Engineering News, American Chemical Society, 7 July. Available online at: http://www.cen-online.org.

FEB (2001) Fiber Economics Bureau, as cited in ACS (2001) Production: slow gains in output of chemicals and products lagged behind U.S. economy as a whole Chemical & Engineering News, American Chemical Society, 25 June. Available online at: http://pubs.acs.org/cen.

Financial Planning Association (2006) Canada/US Cross-Border Tools: US/Canada Exchange Rates. Available online at: http://www.fpanet.org/global/planners/US Canada ex rates.cfm. Accessed on August 16, 2006.

Gosselin, Smith, and Hodge (1984) "Clinical Toxicology of Commercial Products." Fifth Edition, Williams & Wilkins, Baltimore.

ICIS (2016) "Production issues force US melamine plant down" Available online at:

https://www.icis.com/resources/news/2016/05/03/9994556/production-issues-force-us-melamine-plant-down/.

ICIS (2008) "Chemical profile: Melamine" Available online at:

https://www.icis.com/resources/news/2008/12/01/9174886/chemical-profile-melamine/. Accessed November, 2017.

IISRP (2003) "IISRP Forecasts Moderate Growth in North America to 2007" International Institute of Synthetic Rubber Producers, Inc. New Release. Available online at: http://www.iisrp.com/press-releases/2003-Press-Releases/IISRP-NA-Forecast-03-07.html.

IISRP (2000) "Synthetic Rubber Use Growth to Continue Through 2004, Says IISRP and RMA" International Institute of Synthetic Rubber Producers press release.

INEGI (2006) Producción bruta total de las unidades económicas manufactureras por Subsector, Rama, Subrama y Clase de actividad. Available online at:

http://www.inegi.gob.mx/est/contenidos/espanol/proyectos/censos/ce2004/tb manufacturas.asp. Accessed on August 15, 2006.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Marland, G., and R.M. Rotty (1984) "Carbon dioxide emissions from fossil fuels: A procedure for estimation and results for 1950-1982," Tellus 36b:232-261.

NPRA (2002) North American Wax - A Report Card. Available online at: http://www.npra.org/members/publications/papers/lubes/LW-02-126.pdf.

U.S. Census Bureau (2021) 2017 Economic Census. Available online at:

https://www.census.gov/data/tables/2017/econ/economic-census/naics-sector-31-33.html. Accessed October 2021.

U.S. Census Bureau (2014) 2012 Economic Census. Available online at:

http://www.census.gov/econ/census/schedule/whats been released.html. Accessed November 2014.http://smpbff1.dsd.census.gov/TheDataWeb HotReport/servlet/HotReportEngineServlet?emailname=vh@boc&filename=mfg1.hrml&20071204152004.Var.NAICS2002=325611&forward=20071204152004.Var.NAICS2002

U.S. Census Bureau (2009) Soap and Other Detergent Manufacturing: 2007. Available online at: .

U.S. Census Bureau (2004) *Soap and Other Detergent Manufacturing: 2002*. Issued December 2004. EC02-31I-325611 (RV). Available online at: http://www.census.gov/prod/ec02/ec0231i325611.pdf.

U.S. Census Bureau (1999) *Soap and Other Detergent Manufacturing: 1997*. Available online at: http://www.census.gov/epcd/www/ec97stat.htm.

U.S. International Trade Commission (2022) "Interactive Tariff and Trade DataWeb: Quick Query." Available online at: http://dataweb.usitc.gov/. Accessed September 2022.

USTMA (2022) "2021 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association, Washington, DC. October 2022. Available online at:

 $\frac{\text{https://www.ustires.org/sites/default/files/21\%20US\%20Scrap\%20Tire\%20Management\%20Report\%20101722.pd}{\underline{f}.}$

USTMA (2020) "2019 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association, Washington, DC. October 2020. Available online at:

 $\frac{\text{https://www.ustires.org/sites/default/files/2019\%20USTMA\%20Scrap\%20Tire\%20Management\%20Summary\%20}{\text{Report.pdf}}.$

USTMA (2018) "2017 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association, Washington, DC. July 2018. Available online at: https://www.tyrepress.com/wp-content/uploads/2018/07/USTMA scraptire summ 2017 07 11 2018.pdf.

USTMA (2016) "2015 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association. August 2016. Available online at: https://www.ustires.org/sites/default/files/MAR 028 USTMA.pdf.

USTMA (2014) "2013 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association. November 2014. Available online at: https://www.ustires.org/sites/default/files/MAR 027 USTMA.pdf.

USTMA (2013) "U.S. Scrap Tire Management Summary 2005-2009." U.S. Tire Manufacturers Association. October 2011; Updated September 2013. Available online at:

https://www.ustires.org/sites/default/files/MAR 025 USTMA.pdf.

USTMA (2012) "Scrap Tire Markets: Facts and Figures – Scrap Tire Characteristics." U.S. Tire Manufacturers Association. Accessed 18 on January 2012.

Incineration of Waste

ArSova, Ljupka, Rob van Haaren, Nora Goldstein, Scott M. Kaufman, and Nickolas J. Themelis (2008) "16th Annual BioCycle Nationwide Survey: The State of Garbage in America" BioCycle, JG Press, Emmaus, PA. December.

Bahor, B (2009) Covanta Energy's public review comments re: Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2007. Submitted via email on April 9, 2009 to Leif Hockstad, U.S. EPA.

De Soete, G.G. (1993) "Nitrous Oxide from Combustion and Industry: Chemistry, Emissions and Control." In A. R. Van Amstel, (ed.) Proc. of the International Workshop Methane and Nitrous Oxide: Methods in National Emission Inventories and Options for Control, Amersfoort, NL. February 3-5, 1993.

Energy Recovery Council (2018) Energy Recovery Council. 2018 Directory of Waste to Energy Facilities. Ted Michaels and Karunya Krishnan. October 2018. Available online at: http://energyrecoverycouncil.org/wpcontent/uploads/2019/10/ERC-2018-directory.pdf.

Energy Recovery Council (2009) "2007 Directory of Waste-to-Energy Plants in the United States." Accessed on September 29, 2009.

EIA (2017) MSW Incineration for Heating or Electrical Generation, December 2017, Energy Information Administration, U.S. Department of Energy, Washington, DC. DOE/EIA-0035. Available online at: https://www.eia.gov/opendata/?src=-f3.

EIA (2019) EIA St. Louis Federal Reserve's Economic Data (FRED) Consumer Price Index for All Urban Consumers: Education and Communication (CPIEDUSL). Available online at: < https://www.eia.gov/opendata/excel/

EPA (2021). Greenhouse Gas Reporting Program (GHGRP). 2021 Envirofacts. Available online at: https://ghgdata.epa.gov/ghgp/main.do.

EPA (2020a) Advancing Sustainable Materials Management: 2018 Data Tables. Office of Land and Emergency Management, U.S. Environmental Protection Agency. Washington, D.C. Available online at: https://www.epa.gov/sites/production/files/2020-11/documents/2018 ff fact sheet.pdf.

EPA (2020b). Greenhouse Gas Reporting Program (GHGRP). 2020 Envirofacts. Available online at: https://ghgdata.epa.gov/ghgp/main.do.

EPA (2019) Advancing Sustainable Materials Management: 2016 and 2017 Data Tables. Office of Land and Emergency Management, U.S. Environmental Protection Agency. Washington, D.C. Available online at: https://www.epa.gov/sites/production/files/2019-

11/documents/2016 and 2017 facts and figures data tables 0.pdf.

EPA (2018a) Advancing Sustainable Materials Management: 2015 Data Tables. Office of Land and Emergency Management, U.S. Environmental Protection Agency. Washington, D.C. Available online at: https://www.epa.gov/sites/production/files/2018-

07/documents/smm 2015 tables and figures 07252018 fnl 508 0.pdf.

EPA (2018b) Greenhouse Gas Reporting Program Data. Washington, DC: U.S. Environmental Protection Agency. Available online at: https://www.epa.gov/ghgreporting/ghg-reporting-program-data-sets.

EPA (2016) Advancing Sustainable Materials Management: 2014 Fact Sheet. Office of Land and Emergency Management, U.S. Environmental Protection Agency. Washington, D.C. Available online at: https://www.epa.gov/sites/production/files/2016-11/documents/2014 smmfactsheet 508.pdf.

EPA (2015) Advancing Sustainable Materials Management: Facts and Figures 2013 – Assessing Trends in Material Generation, Recycling and Disposal in the United States. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency. Washington, D.C. Available online at:

http://www3.epa.gov/epawaste/nonhaz/municipal/pubs/2013 advncng smm rpt.pdf.

EPA (2007, 2008, 2011, 2013, 2014) *Municipal Solid Waste in the United States: Facts and Figures*. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency. Washington, D.C. Available online at: http://www.epa.gov/osw/nonhaz/municipal/msw99.htm.

EPA (2006) *Solid Waste Management and Greenhouse Gases: A Life-Cycle Assessment of Emissions and Sinks*. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency. Washington, D.C.

EPA (2000) Characterization of Municipal Solid Waste in the United States: Source Data on the 1999 Update. Office of Solid Waste, U.S. Environmental Protection Agency. Washington, D.C. EPA530-F-00-024.

Goldstein, N. and C. Madtes (2001) "13th Annual BioCycle Nationwide Survey: The State of Garbage in America." *BioCycle*, JG Press, Emmaus, PA. December 2001.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom, 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Kaufman, et al. (2004) "14th Annual BioCycle Nationwide Survey: The State of Garbage in America 2004" Biocycle, JG Press, Emmaus, PA. January 2004.

Schneider, S. (2007) E-mail between Shelly Schneider of Franklin Associates (a division of ERG) and Sarah Shapiro of ICF International, January 10, 2007.

Shin, D. (2014) Generation and Disposition of Municipal Solid Waste (MSW) in the United States—A National Survey. Thesis. Columbia University, Department of Earth and Environmental Engineering, January 3, 2014.

Simmons, et al. (2006) "15th Nationwide Survey of Municipal Solid Waste Management in the United States: The State of Garbage in America." BioCycle, JG Press, Emmaus, PA. April 2006.

USTMA (2022) "2021 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association, Washington, DC. October 2022. Available online at:

 $\frac{https://www.ustires.org/sites/default/files/21\%20US\%20Scrap\%20Tire\%20Management\%20Report\%20101722.pd}{f}.$

USTMA (2020) "2019 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association, Washington, DC. October 2020. Available online at:

https://www.ustires.org/sites/default/files/2019%20USTMA%20Scrap%20Tire%20Management%20Summary%20Report.pdf.

USTMA (2018) "2017 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association, Washington, DC. July 2018. Available online at: https://www.tyrepress.com/wpcontent/uploads/2018/07/USTMA scraptire summ 2017 07 11 2018.pdf.

USTMA (2016) "2015 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association. August 2016. Available online at: https://www.ustires.org/sites/default/files/MAR 028 USTMA.pdf.

USTMA (2014) "2013 U.S. Scrap Tire Management Summary." U.S. Tire Manufacturers Association. November 2014. Available online at: https://www.ustires.org/sites/default/files/MAR 027 USTMA.pdf.

USTMA (2013) "U.S. Scrap Tire Management Summary 2005-2009." U.S. Tire Manufacturers Association. October 2011; Updated September 2013. Available online at:

https://www.ustires.org/sites/default/files/MAR 025 USTMA.pdf.

USTMA (2012a) "Rubber FAQs." U.S. Tire Manufacturers Association. Accessed on 19 November 2014.

USTMA (2012b) "Scrap Tire Markets: Facts and Figures – Scrap Tire Characteristics." U.S. Tire Manufacturers Association. Accessed 18 on January 2012.

van Haaren, Rob, Themelis, N., and Goldstein, N. (2010) "The State of Garbage in America." BioCycle, October 2010. Volume 51, Number 10, pg. 16-23.

Coal Mining

AAPG (1984) Coalbed Methane Resources of the United States. AAPG Studies in Geology Series #17.

Creedy, D.P. (1993) Methane Emissions from Coal Related Sources in Britain: Development of a Methodology. Chemosphere, 26: 419-439.

DMME (2022) DGO Data Information System. Department of Mines, Minerals and Energy of Virginia. Available online at https://www.dmme.virginia.gov/dgoinquiry/frmmain.aspx.

EIA (2022) Annual Coal Report 2021. Table 1. Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE/EIA-0584.

El Paso (2009) Shoal Creek Mine Plan, El Paso Exploration & Production.

EPA (2022) Greenhouse Gas Reporting Program (GHGRP) 2020 Subpart FF: Underground Coal Mines.

EPA (2005) Surface Mines Emissions Assessment. Draft. U.S. Environmental Protection Agency.

EPA (1996) Evaluation and Analysis of Gas Content and Coal Properties of Major Coal Bearing Regions of the United States. EPA/600/R-96-065. U.S. Environmental Protection Agency.

ERG (2022). Correspondence between ERG and Buchanan Mine.

Geological Survey of Alabama State Oil and Gas Board (GSA) (2022) Well Records Database. Available online at http://www.gsa.state.al.us/ogb/database.aspx.

IEA (2022) Global coal production, 2018-2021, International Energy Agency, Paris, Licence: CC BY 4.0. Available online at: https://www.iea.org/data-and-statistics/charts/global-coal-production-2018-2021.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Calvo Buendia, E., Tanabe, K., Kranjc, A., Baasansuren, J., Fukuda, M., Ngarize S., Osako, A., Pyrozhenko, Y., Shermanau, P. and Federici, S. (eds). Published: IPCC, Switzerland.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2011) *Use of Models and Facility-Level Data in Greenhouse Gas Inventories*. Report of IPCC Expert Meeting on Use of Models and Measurements in Greenhouse Gas Inventories 9-11 August 2010, Sydney, Australia. Eds: Eggleston H.S., Srivastava N., Tanabe K., Baasansuren J., Fukuda M. IGES.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the *Fourth Assessment Report* of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 996 pp.

JWR (2010) No. 4 & 7 Mines General Area Maps. Walter Energy: Jim Walter Resources.

King, Brian (1994) Management of Methane Emissions from Coal Mines: Environmental, Engineering, Economic and Institutional Implication of Options. Neil and Gunter Ltd.

McElroy OVS (2022) Marshall County VAM Abatement Project Offset Verification Statement submitted to California Air Resources Board, August 2022.

MSHA (2022) Data Transparency at MSHA. Mine Safety and Health Administration. Available online at http://www.msha.gov/.

Mutmansky, Jan M. and Yanbei Wang (2000) Analysis of Potential Errors in Determination of Coal Mine Annual Methane Emissions. *Mineral Resources Engineering*, 9(4).

Saghafi, Abouna (2013) *Estimation of Fugitive Emissions from Open Cut Coal Mining and Measurable Gas Content.* 13th Coal Operators' Conference, University of Wollongong, The Australian Institute of Mining and Metallurgy & Mine Managers Association of Australia. 306-313.

USBM (1986) *Results of the Direct Method Determination of the Gas Contents of U.S. Coal Basins*. Circular 9067. U.S. Bureau of Mines.

West Virginia Geological & Economic Survey (WVGES) (2022) Oil & Gas Production Data. Available online at http://www.wvgs.wvnet.edu/www/datastat/datastat.htm.

Abandoned Underground Coal Mines

CMM (2022) The International Coal Mine Methane Recovery and Utilization Project Database. Available online at: https://www.globalmethane.org/resources/details.aspx?resourceid=1981

CMOP (2022) EPA's Coalbed Methane Outreach Program, Map of US Coal Mine Methane Current Projects and Potential Opportunities. Available online at: https://www.epa.gov/cmop/map-us-coal-mine-methane-current-projects-and-potential-opportunities

COGIS (2018) Colorado Oil and Gas Information System. Colorado Oil and Gas Commission, Department of Natural Resources. Available online at https://cogcc.state.co.us/data.html

EPA (2004) Methane Emissions Estimates & Methodology for Abandoned Coal Mines in the U.S. Draft Final Report. Washington, D.C. April 2004.

GMI (2016) Global Methane Initiative, International Coal Mine Methane Database. Available online at: https://www.globalmethane.org/resources/details.aspx?resourceid=1981

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the *Fifth Assessment Report* of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the *Fourth Assessment Report* of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen,

M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 996 pp.

MSHA (2022) U.S. Department of Labor, Mine Health & Safety Administration, Mine Data Retrieval System. Available online at: https://www.msha.gov/mine-data-retrieval-system.

Petroleum Systems

API (1992) Global Emissions of Methane from Petroleum Sources. American Petroleum Institute, Health and Environmental Affairs Department, Report No. DR140, February 1992.

BOEM (2022a) BOEM Platform Structures Online Query. Available online at: https://www.data.boem.gov/Platform/PlatformStructures/Default.aspx.

BOEM (2022b) BOEM Oil and Gas Operations Reports - Part A (OGOR-A). Production Data for 1947 to 2021. Download "Production Data" online at: https://www.data.boem.gov/Main/RawData.aspx.

BOEM (2022c) BOEM Oil and Gas Operations Reports - Part A (OGOR-A). Production Data for 1996 to 2021. Available online at: https://www.data.boem.gov/Main/OGOR-A.aspx.

BOEM (2022d) BOEM Oil and Gas Operations Reports - Part B (OGOR-B). Flaring volumes for 1996 to 2021. Available online at: https://www.data.boem.gov/Main/OGOR-B.aspx.

EIA (2022) Crude Oil Production. Energy Information Administration.

Enverus (2021) August 2021 Download. Enverus, Inc.

EPA (1997) Compilation of Air Pollutant Emission Factors, AP-42. Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency. Research Triangle Park, NC. October 1997.

EPA (1999) Estimates of Methane Emissions from the U.S. Oil Industry (Draft Report). Prepared by ICF International. Office of Air and Radiation, U.S. Environmental Protection Agency. October 1999.

EPA (2017) 2017 Nonpoint Oil and Gas Emission Estimation Tool, Version 1.2. Prepared for U.S. Environmental Protection Agency by Eastern Research Group, Inc. (ERG). October 2019.

EPA (2022) Greenhouse Gas Reporting Program. U.S. Environmental Protection Agency. Data reported as of August 12, 2022.

EPA/GRI (1996) Methane Emissions from the Natural Gas Industry. Prepared by Radian. U.S. Environmental Protection Agency. April 1996.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Natural Gas Systems

AHS (2021) U.S. Census Bureau's American Housing Survey (AHS). https://www.census.gov/programssurveys/ahs.html.

CBECS (2021) Energy Information Administration's Commercial Buildings Energy Consumption Survey (CBECS). https://www.eia.gov/consumption/commercial.

CenSARA (2012) 2011 Oil and Gas Emission Inventory Enhancement Project for CenSARA States. Prepared by ENVIRON International Corporation and Eastern Research Group, Inc. (ERG). Central States Air Resources Agencies (CenSARA). December 2012.

Cusworth, D.H., Duren, R.M., Thorpe, A.K., Pandey S., Maasakkers, J.D., Aben, I., et al. (2021). *Multisatellite imaging of a gas well blowout enables quantification of total methane emissions*. Geophysical Research Letters, 48, e2020GL090864. https://doi.org/10.1029/2020GL090864

EIA (2022) Natural Gas Gross Withdrawals and Production. Energy Information Administration.

EIA (2022b) October 2021 *Monthly Energy Review*. Energy Information Administration. https://www.eia.gov/totalenergy/data/monthly/archive/00352110.pdf.

Enverus (2021) August 2021 Download. Enverus, Inc.

EPA (1977) Atmospheric Emissions from Offshore Oil and Gas Development and Production. Office of Air Quality Planning and Standards, Research Triangle Park, NC. PB272268. June 1977.

EPA (2020) MOVES3. https://www.epa.gov/moves/latest-version-motor-vehicle-emission-simulator-moves.

EPA (2021) Nonpoint Oil & Gas Emission estimation Tool. Data received via email in November 2021.

EPA (2022) *Greenhouse Gas Reporting Program- Subpart W – Petroleum and Natural Gas Systems*. Environmental Protection Agency. Data reported as of August 12, 2022.

Fischer et al. (2018) "An Estimate of Natural Gas Methane Emissions from California Homes." *Environmental Science & Technology* 2018, *52* (*17*), 10205–10213. https://pubs.acs.org/doi/10.1021/acs.est.8b03217.

GRI/EPA (1996) *Methane Emissions from the Natural Gas Industry*. Prepared by Harrison, M., T. Shires, J. Wessels, and R. Cowgill, eds., Radian International LLC for National Risk Management Research Laboratory, Air Pollution Prevention and Control Division, Research Triangle Park, NC. EPA-600/R-96-080a.

GTI (2001) Gas Resource Database: Unconventional Natural Gas and Gas Composition Databases. Second Edition. GRI-01/0136.

GTI (2019) Classification of Methane Emissions from Industrial Meters, Vintage vs Modern Plastic Pipe, and Plastic-lined Steel and Cast-Iron Pipe. June 2019. Gas Technology Institute and U.S. Department of Energy GTI Project Number 22070. DOE project Number ED-FE0029061.

Illinois Office of Oil and Gas Resource Management (2020) State-level natural gas production quantities.

Indiana Division of Oil & Gas (2020) State-level natural gas production quantities.

Kansas Department of Health and Environment (2020) County-level produced water quantities.

Lamb, et al. (2015) "Direct Measurements Show Decreasing Methane Emissions from Natural Gas Local Distribution Systems in the United States." *Environmental Science & Technology, Vol. 49* 5161-5169.

Lavoie et al. (2017) "Assessing the Methane Emissions from Natural Gas-Fired Power Plants and Oil Refineries." *Environmental Science & Technology*. 2017 Mar 21;51(6):3373-3381. doi: 10.1021/acs.est.6b05531.

Maasakkers, Joannes D., Mark Omara, Ritesh Gautam, Alba Lorente, Sudhanshu Pandey, Paul Tol, Tobias Borsdorff, Sander Houweling, Ilse Aben (2022). *Reconstructing and quantifying methane emissions from the full duration of a 38-day natural gas well blowout using space-based observations*. Remote Sensing of Environment. https://doi.org/10.1016/j.rse.2021.112755.Ohio Environmental Protection Agency (2020) Well-level produced water quantities.

Oklahoma Department of Environmental Quality (2020) Well-level produced water quantities.

Pandey, S., Gautam, R., Houweling, S., van der Gon, H. D., Sadavarte, P., Borsdorff, T., et al. (2019). *Satellite observations reveal extreme methane leakage from a natural gas well blowout*. Proceedings of the National Academy of Sciences, 116, 26376–26381. https://doi.org/10.1073/pnas.1908712116

PHMSA (2022a) Gas Distribution Annual Data. Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, Washington, DC. Available online at: https://www.phmsa.dot.gov/data-and-statistics/pipeline/annual-report-mileage-gas-distribution-systems.

PHMSA (2022b) Underground Natural Gas STAR, Part C. Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, Washington, DC. https://www.phmsa.dot.gov/data-and-statistics/pipeline/gasdistribution-gas-gathering-gas-transmission-hazardous-liquids.

West Virginia Department of Environmental Protection (2020) State-level natural gas production quantities.

Zimmerle et al. (2019) "Characterization of Methane Emissions from Gathering Compressor Stations." October 2019. Available at https://mountainscholar.org/handle/10217/195489.

Zimmerle, et al. (2015) "Methane Emissions from the Natural Gas Transmission and Storage System in the United States." Environmental Science and Technology, Vol. 49 9374–9383.

Abandoned Oil and Gas Wells

Alaska Oil and Gas Conservation Commission, Available online at: https://www.commerce.alaska.gov/web/aogcc/Data.aspx.

Arkansas Geological & Conservation Commission, "List of Oil & Gas Wells - Data From November 1, 1936 to January 1, 1955."

The Derrick's Handbook of Petroleum: A Complete Chronological and Statistical Review of Petroleum Developments From 1859 to 1898 (V.1), (1898-1899) (V.2).

Enverus (2021) August 2021 Download. Enverus, Inc.

GRI/EPA (1996) Methane Emissions from the Natural Gas Industry. Prepared by Harrison, M., T. Shires, J. Wessels, and R. Cowgill, eds., Radian International LLC for National Risk Management Research Laboratory, Air Pollution Prevention and Control Division, Research Triangle Park, NC. EPA-600/R-96-080a.

Florida Department of Environmental Protection - Oil and Gas Program, Available online at: https://floridadep.gov/water/oil-gas.

Geological Survey of Alabama, Oil & Gas Board, Available online at: https://www.gsa.state.al.us/ogb/.

GTI (2001) Gas Resource Database: Unconventional Natural Gas and Gas Composition Databases. Second Edition. GRI-01/0136.

Interstate Oil and Gas Compact Commission (2021). IDLE AND ORPHAN OIL AND GAS WELLS: STATE AND PROVINCIAL REGULATORY STRATEGIES 2021. Available online at:

https://iogcc.ok.gov/sites/g/files/gmc836/f/iogcc idle and orphan wells 2021 final web.pdf.

Kang, et al. (2016) "Identification and characterization of high methane-emitting abandoned oil and gas wells." PNAS, vol. 113 no. 48, 13636–13641, doi: 10.1073/pnas.1605913113.

Oklahoma Geological Survey. "Oklahoma Oil: Past, Present, and Future." Oklahoma Geology Notes, v. 62 no. 3, 2002 pp. 97-106.

Pennsylvania Department of Environmental Protection, Oil and Gas Reports - Oil and Gas Operator Well Inventory. Available online at:

http://www.depreportingservices.state.pa.us/ReportServer/Pages/ReportViewer.aspx?/Oil Gas/OG Well Invento

Energy Sources of Precursor Greenhouse Gases

EPA (2022) "Criteria pollutants National Tier 1 for 1970 - 2021." National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data. Office of Air Quality Planning and Standards, February 2022. Available online at: https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data.EPA (2021) Resource

Conservation and Recovery Act (RCRA) Info, Biennial Report, GM Form (Section 2- Onsite Management) and WR Form.

EPA (2021) "2017 National Emissions Inventory (NEI) Technical Support Document (TSD)." Office of Air Quality Planning and Standards, April 2021. Available online at: https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-technical-support-document-tsd.

EPA (2003) Email correspondence containing preliminary ambient air pollutant data. Office of Air Pollution and the Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency. December 22, 2003.

International Bunker Fuels

Anderson, B.E., et al. (2011) Alternative Aviation Fuel Experiment (AAFEX), NASA Technical Memorandum, in press.

ASTM (1989) *Military Specification for Turbine Fuels, Aviation, Kerosene Types*, NATO F-34 (JP-8) and NATO F-35. February 10, 1989.

DHS (2008) Personal Communication with Elissa Kay, Residual and Distillate Fuel Oil Consumption (International Bunker Fuels). Department of Homeland Security, Bunker Report. January 11, 2008.

DLA Energy (2022) Unpublished data from the Defense Fuels Automated Management System (DFAMS). Defense Energy Support Center, Defense Logistics Agency, U.S. Department of Defense. Washington, D.C.

DOC (1991 through 2022) Unpublished Report of Bunker Fuel Oil Laden on Vessels Cleared for Foreign Countries. Form-563. Foreign Trade Division, Bureau of the Census, U.S. Department of Commerce. Washington, D.C.

DOT (1991 through 2013) Fuel Cost and Consumption. Federal Aviation Administration, Bureau of Transportation Statistics, U.S. Department of Transportation. Washington, D.C. DAI-10.

EIA (2023) *Monthly Energy Review, February 2023,* Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0035(2023/02).

EPA (2020) EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Updated Gasoline and Diesel Fuel CO₂ Emission Factors – Memo.

FAA (2023) Personal Communication between FAA and John Steller, Mausami Desai, and Vincent Camobreco for aviation emissions estimates from the Aviation Environmental Design Tool (AEDT). February 2023.

IPCC/UNEP/OECD/IEA (1997) Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories. 31 Intergovernmental Panel on Climate Change, United Nations Environment Programme, Organization for Economic 32 Co-Operation and Development, International Energy Agency, Paris, France.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom, 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan. USAF (1998) Fuel Logistics Planning. U.S. Air Force pamphlet AFPAM23-221, May 1, 1998.

Wood Biomass and Biofuel Consumption

EIA (2023a) Monthly Energy Review, February 2023. Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE/EIA-0035(2023/02).

EIA (2023b) Biofuels explained: Use of biomass-based diesel fuel. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: https://www.eia.gov/energyexplained/biofuels/useof-biodiesel.php.

EPA (2023) Acid Rain Program Dataset 1996-2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

EPA (2022). Greenhouse Gas Reporting Program (GHGRP). 2021 Envirofacts. Available online at: https://ghgdata.epa.gov/ghgp/main.do.

EPA (2010) Carbon Content Coefficients Developed for EPA's Mandatory Reporting Rule. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

Lindstrom, P. (2006) Personal Communication. Perry Lindstrom, Energy Information Administration and Jean Kim, ICF International.

Energy Sources of Precursor Greenhouse Gases

EPA (2023a) "Criteria pollutants National Tier 1 for 1970 - 2022." National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data. Office of Air Quality Planning and Standards, March 2023. Available online at: https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data.

EPA (2023b) "2020 National Emissions Inventory Technical Support Document: Introduction." Office of Air Quality Planning and Standards, March 2023. Available online at: https://www.epa.gov/system/files/documents/2023- 01/NEI2020 TSD Section1 Introduction.pdf.

Industrial Processes and Product Use

EPA (2014) Greenhouse Gas Reporting Program. Developments on Publication of Aggregated Greenhouse Gas Data, November 25, 2014. See http://www.epa.gov/ghgreporting/confidential-business-information-ghgreporting.

EPA (2002) Quality Assurance/Quality Control and Uncertainty Management Plan for the U.S. Greenhouse Gas Inventory: Procedures Manual for Quality Assurance/Quality Control and Uncertainty Analysis, U.S. Greenhouse Gas Inventory Program, U.S. Environmental Protection Agency, Office of Atmospheric Programs, EPA 430-R-02-007B, June 2002.

IPCC (2011) Use of Models and Facility-Level Data in Greenhouse Gas Inventories (Report of IPCC Expert Meeting on Use of Models and Measurements in Greenhouse Gas Inventories 9-11 August 2010, Sydney, Australia) eds.: Eggleston H.S., Srivastava N., Tanabe K., Baasansuren J., Fukuda M., Pub. IGES, Japan 2011.

Cement Production

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

U.S. Bureau of Mines (1990 through 1993) *Minerals Yearbook: Cement Annual Report*. U.S. Department of the Interior, Washington, D.C.

U.S. Environmental Protection Agency (EPA) (2015) *Greenhouse Gas Reporting Program Report Verification*. Available online at https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp verification factsheet.pdf.

U.S. EPA (2022) Greenhouse Gas Reporting Program (GHGRP). Aggregation of Reported Facility Level Data under Subpart H -National Level Clinker Production from Cement Production for Calendar Years 2014 through 2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

United States Geological Survey (USGS) (2022a) 2020 Minerals Yearbook – Cement (Advance Release Tables). U.S. Geological Survey, Reston, VA. July 2022.

USGS (2022b) *Mineral Commodity Summaries: Cement*. U.S. Geological Survey, Reston, VA. January 2022. Available at: https://pubs.usgs.gov/periodicals/mcs2022/mcs2022-cement.pdf.

USGS (1995 through 2014) Minerals Yearbook - Cement. U.S. Geological Survey, Reston, VA.

Van Oss (2013a) 1990 through 2012 Clinker Production Data Provided by Hendrik van Oss (USGS) via email on November 8, 2013.

Van Oss (2013b) Personal communication. Hendrik van Oss, Commodity Specialist of the U.S. Geological Survey and Gopi Manne, Eastern Research Group, Inc. October 28, 2013.

Lime Production

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Males, E. (2003) Memorandum from Eric Males, National Lime Association to William N. Irving & Leif Hockstad, Environmental Protection Agency. March 6, 2003.

Miner, R. and B. Upton (2002) Methods for estimating greenhouse gas emissions from lime kilns at kraft pulp mills. Energy. Vol. 27 (2002), p. 729-738.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

Seeger (2013) Memorandum from Arline M. Seeger, National Lime Association to Leif Hockstad, Environmental Protection Agency. March 15, 2013.

U.S. Environmental Protection Agency (EPA) (2022) Greenhouse Gas Reporting Program (GHGRP). Aggregation of Reported Facility Level Data under Subpart S-National Lime Production for Calendar Years 2010 through 2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

United States Geological Survey (USGS) (2022a) 2022 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2022).

USGS (2022b) Personal communication. Lori E. Apodaca, U.S. Geological Survey and Amanda Chiu, U.S. Environmental Protection Agency. November 3, 2022.

USGS (2021a) 2021 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2021).

USGS (2021b) 2020 Minerals Yearbook Annual Tables: Lime. U.S. Geological Survey, Reston, VA (August 2021).

USGS (2021c) (1992 through 2018) Minerals Yearbook: Lime. U.S. Geological Survey, Reston, VA (October 2021).

USGS (2020a) 2020 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2020).

USGS (2020b) (1992 through 2017) Minerals Yearbook: Lime. U.S. Geological Survey, Reston, VA (June 2020).

USGS (2020c) 2018 Minerals Yearbook Annual Tables: Lime. U.S. Geological Survey, Reston, VA (November 2020).

USGS (2019) 2016 Minerals Yearbook: Lime. U.S. Geological Survey, Reston, VA (August 2019).

USGS (2018a) 2018 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2018).

USGS (2018b) 2015 Minerals Yearbook: Lime. U.S. Geological Survey, Reston, VA (March 2018).

USGS (2012a) 2012 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2012).

USGS (2012b) 2012 Expert Elicitation. Michael Miller, U.S. Geological Survey (2012).

USGS (2011) 2011 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2011).

USGS (2010) 2010 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2010).

USGS (2008) 2008 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2008).

USGS (2007) 2007 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2007).

USGS (2002) 2002 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 2002).

USGS (1996) 1996 Mineral Commodities Summary: Lime. U.S. Geological Survey, Reston, VA (January 1996).

USGS (1991) 1991 Minerals Yearbook: Lime. U.S. Geological Survey, Reston, VA (1991).

Glass Production

Federal Reserve (2022) Board of Governors of the Federal Reserve System (US), Industrial Production: Manufacturing: Durable Goods: Glass and Glass Product (NAICS = 3272) [IPG3272N], retrieved from FRED, Federal Reserve Bank of St. Louis. Available at: https://fred.stlouisfed.org/series/IPG3272N. Accessed on December 7, 2022.

Icenhour (2022) Expert judgment. Melissa Icenhour, RTI International. November 16, 2022.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

U.S. Bureau of Mines (1991 and 1993a) Minerals Yearbook: Crushed Stone Annual Report. U.S. Department of the Interior. Washington, D.C.

U.S. Department of Energy (DOE) (2002) Glass Industry of the Future: Energy and Environmental Profile of the U.S. Glass Industry. Office of Industrial Technologies, U.S. Department of Energy. Washington, D.C.

U.S. Environmental Protection Agency (EPA) (2009) Technical Support Document for the Glass Manufacturing Sector: Proposed Rule for Mandatory Reporting of Greenhouse Gases. U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2022) Greenhouse Gas Reporting Program (GHGRP). Aggregation of Reported Facility Level Data under Subpart N -National Glass Production for Calendar Years 2010 through 2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

United States Geological Survey (USGS) (1995 through 2015b) Minerals Yearbook: Soda Ash Annual Report. U.S. Geological Survey, Reston, VA.

USGS (2017) Minerals Industry Surveys: Soda Ash in January 2017. U.S. Geological Survey, Reston, VA. March 2017.

USGS (2018) Mineral Industry Surveys: Soda Ash in February 2018. U.S. Geological Survey, Reston, VA. 2018.

USGS (2019) Mineral Industry Surveys: Soda Ash in December 2018. U.S. Geological Survey, Reston, VA. March 2019.

USGS (2020) Mineral Industry Surveys: Soda Ash in April 2020. U.S. Geological Survey, Reston, VA. July 2020.

USGS (2021) Mineral Industry Surveys: Soda Ash in April 2021. U.S. Geological Survey, Reston, VA. July 2021.

USGS (2022) Mineral Industry Surveys: Soda Ash in June 2022. U.S. Geological Survey, Reston, VA. November 2022.

Other Process Uses of Carbonates

AISI (2018 through 2021) Annual Statistical Report. American Iron and Steel Institute.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Kostick, D. S. (2012) Personal communication. Dennis S. Kostick, U.S. Geological Survey, Soda Ash Commodity Specialist and Gopi Manne and Bryan Lange of Eastern Research Group, Inc. October 2012.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

U.S. Bureau of Mines (1991 and 1993a) *Minerals Yearbook: Crushed Stone Annual Report*. U.S. Department of the Interior. Washington, D.C.

U.S. Environmental Protection Agency (EPA) (2022). Greenhouse Gas Reporting Program (GHGRP). Dataset as of August 12, 2022. Available online at: https://ghgdata.epa.gov/ghgp/

United States Geological Survey (USGS) (2017a) *Mineral Industry Surveys: Soda Ash in January 2017*. U.S. Geological Survey, Reston, VA. March 2017.

USGS (2018) Mineral Industry Surveys: Soda Ash in February 2018. U.S. Geological Survey, Reston, VA. 2018.

USGS (2019) Mineral Industry Surveys: Soda Ash in April 2019. U.S. Geological Survey, Reston, VA. July 2019.

USGS (2020a) 2016 Minerals Yearbook: Stone, Crushed [Advanced Release]. U.S. Geological Survey, Reston, VA. January 2020.

USGS (2020b) Mineral Industry Surveys: Soda Ash in April 2020. U.S. Geological Survey, Reston, VA. July 2020.

USGS (2020c) *Minerals Yearbook 2017: Stone, Crushed [Advanced Data Release of the 2017 Annual Tables]*. U.S. Geological Survey, Reston, VA. August 2020.

USGS (2021a) 2017 *Minerals Yearbook: Stone, Crushed [Advanced Release]*. U.S. Geological Survey, Reston, VA. June 2021.

USGS (2021b) 2020 Mineral Commodity Summaries: Stone (Crushed). U.S. Geological Survey, Reston, VA. January 2021.

USGS (2021c) Minerals Yearbook 2019: Soda Ash [Advanced Data Release of the 2019 Annual Tables]. U.S. Geological Survey, Reston, VA. August 2021.

USGS (2021d) Mineral Industry Surveys: Soda Ash in April 2021. U.S. Geological Survey, Reston, VA. July 2021.

USGS (2022a) 2018 Minerals Yearbook: Stone, Crushed [Advanced Release]. U.S. Geological Survey, Reston, VA. August 2022.

USGS (2022b) *Mineral Industry Surveys: Soda Ash in August 2022*. U.S. Geological Survey, Reston, VA. November 2022.

USGS (1995a through 2017) Minerals Yearbook: Crushed Stone Annual Report. U.S. Geological Survey, Reston, VA.

USGS (1994 through 2015b) Minerals Yearbook: Soda Ash Annual Report. U.S. Geological Survey, Reston, VA.

Willett (2017) Personal communication, Jason Christopher Willett, U.S. Geological Survey and Mausami Desai and John Steller, U.S. Environmental Protection Agency. March 9, 2017.

Willett (2022) Personal communication, Jason Christopher Willett, U.S. Geological Survey and Amanda Chiu, U.S. Environmental Protection Agency. November 15, 2022.

Ammonia Production

ACC (2021) Business of Chemistry (Annual Data). American Chemistry Council, Arlington, VA.

Coffeyville Resources Energy, Inc. (CVR) (2008) CVR Energy, Inc. 2008 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annual-report-and-proxy-archive.

CVR (2009) CVR Energy, Inc. 2009 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2010) CVR Energy, Inc. 2010 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2011) CVR Energy, Inc. 2011 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2012) CVR Energy, Inc. 2012 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2013) CVR Energy, Inc. 2013 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2014) CVR Energy, Inc. 2014 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2015) CVR Energy, Inc. 2015 Annual Report. Available online at: https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2016) CVR Energy, Inc. 2016 CVI Annual Report on Form 10-K (Web). Available online at: https://cvrenergy.gcs-web.com/annual-report-and-proxy-archive.

CVR (2017) CVR Energy, Inc. 2017 CVI Annual Report on Form 10-K (Web). Available online at: https://cvrenergy.gcs-web.com/annual-report-and-proxy-archive.

CVR (2018) CVR Energy, Inc. 2018 CVI Annual Report on Form 10-K -- Final. Available online at: https://cvrenergy.gcs-web.com/annual-report-and-proxy-archive.

CVR (2019) CVR Energy, Inc. 2019 CVI Form 10-K - Final. Available online at https://cvrenergy.gcs-web.com/annualreport-and-proxy-archive.

CVR (2020) CVR Energy, Inc. 2018 CVI Annual Report on Form 10-K -- Final. Available online at: https://cvrenergy.gcs-web.com/annual-report-and-proxy-archive.

CVR (2021) CVR Energy, Inc. 2021 CVI Annual Report on Form 10-K. Available online at: https://cvrenergy.gcsweb.com/annual-report-and-proxy-archive.

EFMA (2000) Best Available Techniques for Pollution Prevention and Control in the European Fertilizer Industry. Booklet No. 5 of 8: Production of Urea and Urea Ammonium Nitrate. Available online at: http://fertilizerseurope.com/site/index.php?id=390.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

United States Census Bureau (2011) *Current Industrial Reports Fertilizer Materials and Related Products: 2010 Summary.* Available online at: http://www.census.gov/manufacturing/cir/historical_data/mq325b/index.html.

- U.S. Census Bureau (2010) *Current Industrial Reports Fertilizer Materials and Related Products: 2009 Summary.* Available online at: http://www.census.gov/manufacturing/cir/historical data/mq325b/index.html.
- U.S. Census Bureau (2009) *Current Industrial Reports Fertilizer Materials and Related Products: 2008 Summary.*Available online at: http://www.census.gov/manufacturing/cir/historical_data/mg325b/index.html.
- U.S. Census Bureau (2008) *Current Industrial Reports Fertilizer Materials and Related Products: 2007 Summary*. Available online at: http://www.census.gov/cir/www/325/mq325b/mq325b075.xls.
- U.S. Census Bureau (2007) *Current Industrial Reports Fertilizer Materials and Related Products: 2006 Summary*. Available online at: http://www.census.gov/industry/1/mg325b065.pdf.
- U.S. Census Bureau (2006) *Current Industrial Reports Fertilizer Materials and Related Products: 2005 Summary*. Available online at: http://www.census.gov/cir/www/325/mg325b.html.
- U.S. Census Bureau (2004, 2005) *Current Industrial Reports Fertilizer Materials and Related Products: Fourth Quarter Report Summary*. Available online at: http://www.census.gov/cir/www/325/mg325b.html.
- U.S. Census Bureau (1998 through 2003) *Current Industrial Reports Fertilizer Materials and Related Products: Annual Reports Summary*. Available online at: http://www.census.gov/cir/www/325/mq325b.html.
- U.S. Census Bureau (1991 through 1994) *Current Industrial Reports Fertilizer Materials Annual Report.* Report No. MQ28B. U.S. Census Bureau, Washington, D.C.

United States EIA (2023) *Monthly Energy Review, February 2023,* Energy Information Administration, U.S. Department of Energy, Washington, DC. DOE/EIA-0035(2022/11).

United States Environmental Protection Agency (EPA) (2018) Greenhouse Gas Reporting Program. Aggregation of Reported Facility Level Data under Subpart G -Annual Urea Production from Ammonia Manufacturing for Calendar Years 2011-2016. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2022) Greenhouse Gas Reporting Program. Aggregation of Reported Facility Level Data under Subpart G - Annual Urea Production from Ammonia Manufacturing for Calendar Years 2017-2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

United States Geological Survey (USGS) (2022) 2022 Mineral Commodity Summaries: Nitrogen (Fixed) - Ammonia. January 2022. Available online at: https://pubs.usgs.gov/periodicals/mcs2022/mcs2022-nitrogen.pdf.

USGS (1994-2009) *Minerals Yearbook: Nitrogen*. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/nitrogen/.

Urea Consumption for Non-Agricultural Purposes

EFMA (2000) Best Available Techniques for Pollution Prevention and Control in the European Fertilizer Industry. Booklet No. 5 of 8: Production of Urea and Urea Ammonium Nitrate.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

TFI (2002) U.S. Nitrogen Imports/Exports Table. The Fertilizer Institute. Available online at: http://www.tfi.org/statistics/usnexim.asp. August 2002.

United States Census Bureau (2001 through 2011) Current Industrial Reports Fertilizer Materials and Related Products: Annual Summary. Available online at:

http://www.census.gov/manufacturing/cir/historical data/index.html.

United States Department of Agriculture (2012) Economic Research Service Data Sets, Data Sets, U.S. Fertilizer Imports/Exports: Standard Tables. Available online at: http://www.ers.usda.gov/data-products/fertilizerimportsexports/standard-tables.aspx.

United States Environmental Protection Agency (EPA) (2018) Greenhouse Gas Reporting Program. Aggregation of Reported Facility Level Data under Subpart G -Annual Urea Production from Ammonia Manufacturing for Calendar Years 2011-2016. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2022a) Greenhouse Gas Reporting Program. Aggregation of Reported Facility Level Data under Subpart G -Annual Urea Production from Ammonia Manufacturing for Calendar Years 2017-2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2022b). Greenhouse Gas Reporting Program. Dataset as of August 13, 2022. Available online at: https://ghgdata.epa.gov/ghgp/.

United States International Trade Commission (ITC) (2002) United States International Trade Commission Interactive Tariff and Trade DataWeb, Version 2.5.0. Available online at: http://dataweb.usitc.gov/. August 2002.

United States Geological Survey (USGS) (1994 through 2021a) Minerals Yearbook: Nitrogen. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/nitrogen/.

USGS (2022b) Minerals Commodity Summaries: Nitrogen (Fixed) – Ammonia. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/nitrogen/.

Nitric Acid Production

Climate Action Reserve (CAR) (2013) Project Report. Available online at: https://thereserve2.apx.com/myModule/rpt/myrpt.asp?r=111. Accessed on 18 January 2013.

Desai (2012) Personal communication. Mausami Desai, U.S. Environmental Protection Agency, January 25, 2012.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

United States Census Bureau (2010a) *Current Industrial Reports. Fertilizers and Related Chemicals: 2009.* "Table 1: Summary of Production of Principle Fertilizers and Related Chemicals: 2009 and 2008." June, 2010. MQ325B(08)-5. Available online at: http://www.census.gov/manufacturing/cir/historical_data/mq325b/index.html.

- U.S. Census Bureau (2010b) Personal communication between Hilda Ward (of U.S. Census Bureau) and Caroline Cochran (of ICF International). October 26, 2010 and November 5, 2010.
- U.S. Census Bureau (2009) *Current Industrial Reports. Fertilizers and Related Chemicals: 2008.* "Table 1: Shipments and Production of Principal Fertilizers and Related Chemicals: 2004 to 2008." June, 2009. MQ325B(08)-5. Available online at: http://www.census.gov/manufacturing/cir/historical_data/mq325b/index.html.
- U.S. Census Bureau (2008) *Current Industrial Reports. Fertilizers and Related Chemicals: 2007.* "Table 1: Shipments and Production of Principal Fertilizers and Related Chemicals: 2003 to 2007." June, 2008. MQ325B(07)-5. Available online at: http://www.census.gov/manufacturing/cir/historical_data/mg325b/index.html.

United States Environmental Protection Agency (EPA) (2022) Greenhouse Gas Reporting Program. Aggregation of Reported Facility Level Data under Subpart V -National Nitric Acid Production for Calendar Years 2010 through 2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2015) *Greenhouse Gas Reporting Program Report Verification*. Available online at https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp-verification-factsheet.pdf.

U.S. EPA (2013) *Draft Nitric Acid Database.* U.S. Environmental Protection Agency, Office of Air and Radiation. September 2010.

U.S. EPA (2012) Memorandum from Mausami Desai, U.S. EPA to Mr. Bill Herz, The Fertilizer Institute. November 26, 2012.

U.S. EPA (2010) Available and Emerging Technologies for Reducing Greenhouse Gas Emissions from the Nitric Acid Production Industry. Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency. Research Triangle Park, NC. December 2010. Available online at: http://www.epa.gov/nsr/ghgdocs/nitricacid.pdf.

U.S. EPA (1998) *Compilation of Air Pollutant Emission Factors, AP-42*. Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency. Research Triangle Park, NC. February 1998.

Adipic Acid Production

ACC (2022) Business of Chemistry (Annual Data). American Chemistry Council, Arlington, VA.

C&EN (1995) "Production of Top 50 Chemicals Increased Substantially in 1994." *Chemical & Engineering News*, 73(15):17. April 10, 1995.

C&EN (1994) "Top 50 Chemicals Production Rose Modestly Last Year." *Chemical & Engineering News*, 72(15):13. April 11, 1994.

C&EN (1993) "Top 50 Chemicals Production Recovered Last Year." *Chemical & Engineering News*, 71(15):11. April 12, 1993.

C&EN (1992) "Production of Top 50 Chemicals Stagnates in 1991." *Chemical & Engineering News*, 70(15): 17. April 13, 1992.

CMR (2001) "Chemical Profile: Adipic Acid." Chemical Market Reporter. July 16, 2001.

CMR (1998) "Chemical Profile: Adipic Acid." Chemical Market Reporter. June 15, 1998.

CW (2005) "Product Focus: Adipic Acid." Chemical Week. May 4, 2005.

CW (1999) "Product Focus: Adipic Acid/Adiponitrile." Chemical Week, p. 31. March 10, 1999.

Desai (2010, 2011) Personal communication. Mausami Desai, U.S. Environmental Protection Agency and Adipic Acid Plant Engineers. 2010 and 2011.

ICIS (2007) "Adipic Acid." ICIS Chemical Business Americas. July 9, 2007.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Reimer, R.A., Slaten, C.S., Seapan, M., Koch, T.A. and Triner, V.G. (1999) "Implementation of Technologies for Abatement of N₂O Emissions Associated with Adipic Acid Manufacture." Proceedings of the 2nd Symposium on Non-CO₂ Greenhouse Gases (NCGG-2), Noordwijkerhout, The Netherlands, 8-10 Sept. 1999, Ed. J. van Ham et al., Kluwer Academic Publishers, Dordrecht, pp. 347-358.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

Thiemens, M.H., and W.C. Trogler (1991) "Nylon production; an unknown source of atmospheric nitrous oxide." Science 251:932-934.

United States Environmental Protection Agency (EPA) (2022) Greenhouse Gas Reporting Program. Subpart E Data. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C. Available online at: https://www.epa.gov/ghgreporting/ghg-reporting-program-data-sets.

U.S. EPA (2019, 2020) Greenhouse Gas Reporting Program. Subpart E, S-CEMS, BB, CC, LL Data Set (XLSX) (Adipic Acid Tab). Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C. Available online at: https://www.epa.gov/ghgreporting/ghg-reporting-program-data-sets.

U.S. EPA (2015). Greenhouse Gas Reporting Program Report Verification. Available online at https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp verification factsheet.pdf.

U.S. EPA (2014 through 2018) Greenhouse Gas Reporting Program. Subpart E, S-CEMS, BB, CC, LL Data Set (XLSX) (Adipic Acid Tab). Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C. Available online at: http://www2.epa.gov/ghgreporting/ghg-reporting-program-data-

U.S. EPA (2010 through 2013) Analysis of Greenhouse Gas Reporting Program data - Subpart E (Adipic Acid), Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

Caprolactam, Glyoxal and Glyoxylic Acid Production

American Chemistry Council (ACC) (2022) Business of Chemistry (Annual Data). American Chemistry Council, Arlington, VA.

AdvanSix (2022) AdvanSix's Hopewell Facility Fact Sheet. Retrieved from: https://www.advansix.com/hopewell/about-us/ on October 7, 2022.

BASF (2022) Welcome to BASF in Freeport Texas. Retrieved from https://www.basf.com/us/en/who-weare/organization/locations/featured-sites/Freeport.html on October 7, 2022.

ChemView (2021). Compilation of data submitted under TSCA in 2012 and 2016. Accessed April 2021. Available at https://chemview.epa.gov/chemview.

Cline, D. (2019) Firm to Clean Up and Market Former Fibrant Site. *The Augusta Chronicle*. September 9, 2019. Retrieved from https://www.augustachronicle.com.

Cogburn, M.O. (2012). *United States v. Emerald Carolina Chem., LLC*. Consent Decree, Civil Action No. 3:12-cv-00554. United States District Court for the Western District of North Carolina, Charlotte Division. Decided October 25, 2012. Available at https://casetext.com/case/united-states-v-emerald-carolina-chem.

Ecofys, et al. (2009). Methodology for the free allocation of emission allowances in the EU ETS post 2012: Sector Report for the Chemical Industry. Prepared by Ecofys, Fraunhofer Institute for Systems and Innovation Research, and Oko-Institut for the European Commission. November 2009. Available at https://ec.europa.eu/clima/system/files/2016-11/bm study-chemicals en.pdf.

ICIS (2004) Chemical Profile – Caprolactam. January 5, 2004. Available online at: https://www.icis.com/explore/resources/news/2005/12/02/547244/chemical-profile-caprolactam/.

ICIS (2006) Chemical Profile – Caprolactam. October 15, 2006. Available online at: https://www.icis.com/explore/resources/news/2006/10/18/2016832/chemical-profile-caprolactam/.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

Shaw Industries Group, Inc. (Shaw) (2015) "Shaw Carpet Recycling Facility Successfully Processes Nylon and Polyester". July 13, 2015. Available online at: https://shawinc.com/Newsroom/Press-Releases/Shaw-Carpet-Recycling-Facility-Successfully-Proces/.

Textile World (2000) "Evergreen Makes Nylon Live Forever". Textile World. October 1, 2000. Available online at: https://www.textileworld.com/textile-world/textile-news/2000/10/evergreen-makes-nylon-live-forever/.

Carbide Production and Consumption

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Environment and Climate Change Canada (ECCC) (2022), Personal Communication between Genevieve Leblanc-Power, Environment and Climate Change Canada and Mausami Desai and Amanda Chiu, U.S. Environmental Protection Agency. April 12, 2022.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

United States Census Bureau (2005 through 2021) USITC Trade DataWeb. Available online at: http://dataweb.usitc.gov/.

United States Geological Survey (USGS) (2021) 2018 Minerals Yearbook: Abrasives, Manufactured [Advance Release]. October 2021. U.S. Geological Survey, Reston, VA. Available online at: https://www.usgs.gov/centers/nmic/manufactured-abrasives-statistics-and-information.

USGS (1991a through 2021) Minerals Yearbook: Manufactured Abrasives Annual Report. U.S. Geological Survey, Reston, VA. Available online at: https://www.usgs.gov/centers/national-minerals-informationcenter/manufactured-abrasives-statistics-and-information.

USGS (1991b through 2021b) Minerals Yearbook: Silicon Annual Report. U.S. Geological Survey, Reston, VA. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/silicon/.

Washington Mills (2023), North Grafton, MA. Available online at: https://www.washingtonmills.com/siliconcarbide/sic-industries. Accessed on April 4, 2023.

Titanium Dioxide Production

Gambogi, J. (2002) Telephone communication. Joseph Gambogi, Commodity Specialist, U.S. Geological Survey and Philip Groth, ICF International. November 2002.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

United States Geological Survey (USGS) (2022) Mineral Commodity Summaries: Titanium and Titanium Dioxide. U.S. Geological Survey, Reston, Va. January 2022.

USGS (1991 through 2021) Minerals Yearbook: Titanium. U.S. Geological Survey, Reston, VA.

Soda Ash Production

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

United States Geological Survey (USGS) (2022a) Mineral Commodity Summary: Soda Ash. U.S. Geological Survey, Reston, VA. Accessed September 2022.

USGS (2022b) Mineral Industry Surveys: Soda Ash in June 2022. U.S. Geological Survey, Reston, VA. Accessed September 2022.

USGS (2021) *Mineral Industry Surveys: Soda Ash in April 2021*. U.S. Geological Survey, Reston, VA. Accessed September 2021.

USGS (2020) *Mineral Industry Surveys: Soda Ash in April 2020*. U.S. Geological Survey, Reston, VA. Accessed September 2020.

USGS (2019) Mineral Industry Surveys: Soda Ash in April 2019. U.S. Geological Survey, Reston, VA. Accessed August 2019

USGS (2018a) *Mineral Industry Surveys: Soda Ash in February 2018*. U.S. Geological Survey, Reston, VA. Accessed September 2018.

USGS (2017) Mineral Industry Surveys: Soda Ash in January 2017. U.S. Geological Survey, Reston, VA. March 2017.

USGS (2016) *Mineral Industry Surveys: Soda Ash in November 2016*. U.S. Geological Survey, Reston, VA. January 2017.

USGS (2015a) Mineral Industry Surveys: Soda Ash in July 2015. U.S. Geological Survey, Reston, VA. September 2015.

USGS (1994 through 2015b, 2018b) *Minerals Yearbook: Soda Ash Annual Report*. U.S. Geological Survey, Reston, VA

USGS (1995c) *Trona Resources in the Green River Basin, Southwest Wyoming.* U.S. Department of the Interior, U.S. Geological Survey. Open-File Report 95-476. Wiig, Stephen, Grundy, W.D., Dyni, John R.

Petrochemical Production

ACC (2022a) Business of Chemistry (Annual Data). American Chemistry Council, Arlington, VA.

ACC (2022b) Personal communication. Martha Moore, American Chemistry Council and Amanda Chiu, U.S. Environmental Protection Agency. September 27, 2022.

AN (2014) *About Acrylonitrile: Production*. AN Group, Washington, D.C. Available online at: http://www.angroup.org/about/production.cfm.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom, 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Johnson, G. L. (2005 through 2010) Personal communication. Greg Johnson of Liskow & Lewis, on behalf of the International Carbon Black Association (ICBA) and Caroline Cochran, ICF International. September 2010.

Johnson, G. L. (2003) Personal communication. Greg Johnson of Liskow & Lewis, on behalf of the International Carbon Black Association (ICBA) and Caren Mintz, ICF International. November 2003.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

United States Environmental Protection Agency (EPA) (2022) Greenhouse Gas Reporting Program. Aggregation of Reported Facility Level Data under Subpart X -National Petrochemical Production for Calendar Years 2010 through

2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2015) Greenhouse Gas Reporting Program Report Verification. Available online at https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp verification factsheet.pdf.

U.S. EPA (2008) Technical Support Document for the Petrochemical Production Sector: Proposed Rule for Mandatory Reporting of Greenhouse Gases. U.S. Environmental Protection Agency. September 2008.

U.S. EPA (2000) Economic Impact Analysis for the Proposed Carbon Black Manufacturing NESHAP, U.S. Environmental Protection Agency. Research Triangle Park, NC. EPA-452/D-00-003. May 2000.

HCFC-22 Production

ARAP (2010) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. September 10, 2010.

ARAP (2009) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. September 21, 2009.

ARAP (2008) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. October 17, 2008.

ARAP (2007) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. October 2, 2007.

ARAP (2006) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Sally Rand of the U.S. Environmental Protection Agency. July 11, 2006.

ARAP (2005) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. August 9, 2005.

ARAP (2004) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. June 3, 2004.

ARAP (2003) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Sally Rand of the U.S. Environmental Protection Agency. August 18, 2003.

ARAP (2002) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. August 7, 2002.

ARAP (2001) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger of the U.S. Environmental Protection Agency. August 6, 2001.

ARAP (2000) Electronic mail communication from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Sally Rand of the U.S. Environmental Protection Agency. August 13, 2000.

ARAP (1999) Facsimile from Dave Stirpe, Executive Director, Alliance for Responsible Atmospheric Policy to Deborah Ottinger Schaefer of the U.S. Environmental Protection Agency. September 23, 1999.

ARAP (1997) Letter from Dave Stirpe, Director, Alliance for Responsible Atmospheric Policy to Elizabeth Dutrow of the U.S. Environmental Protection Agency. December 23, 1997.

EPA (2015) Greenhouse Gas Reporting Program Report Verification. Available online at https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp verification factsheet.pdf.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

RTI (2008) "Verification of Emission Estimates of HFC-23 from the Production of HCFC-22:Emissions from 1990 through 2006." Report prepared by RTI International for the Climate Change Division. March 2008.

RTI (1997) "Verification of Emission Estimates of HFC-23 from the Production of HCFC-22: Emissions from 1990 through 1996." Report prepared by Research Triangle Institute for the Cadmus Group. November 25, 1997; revised February 16, 1998.

UNFCCC (2014) Report of the Conference of the Parties on its nineteenth session, held in Warsaw from 11 to 23 November 2013. United Nations Framework Convention on Climate Change, Warsaw. (FCCC/CP/2013/10/Add.3). January 31, 2014. Available online at: http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

Carbon Dioxide Consumption

ARI (1990 through 2010) CO_2 Use in Enhanced Oil Recovery. Deliverable to ICF International under Task Order 102, July 15, 2011.

ARI (2007) *CO*₂-EOR: An Enabling Bridge for the Oil Transition. Presented at "Modeling the Oil Transition—a DOE/EPA Workshop on the Economic and Environmental Implications of Global Energy Transitions." Washington, D.C. April 20-21, 2007.

ARI (2006) *CO*₂-EOR: An Enabling Bridge for the Oil Transition. Presented at "Modeling the Oil Transition—a DOE/EPA Workshop on the Economic and Environmental Implications of Global Energy Transitions." Washington, D.C. April 20-21, 2006.

Broadhead (2003) Personal communication. Ron Broadhead, Principal Senior Petroleum Geologist and Adjunct faculty, Earth and Environmental Sciences Department, New Mexico Bureau of Geology and Mineral Resources, and Robin Petrusak, ICF International. September 5, 2003.

COGCC (2014) Monthly CO₂ Produced by County (1999-2009). Available online at: http://cogcc.state.co.us/COGCCReports/production.aspx?id=MonthlyCO2ProdByCounty. Accessed October 2014.

Denbury Resources Inc. (2002 through 2010) Annual Report: 2001 through 2009, Form 10-K. Available online at: http://www.denbury.com/investor-relations/SEC-Filings/SEC-Filings-Details/default.aspx?FilingId=9823015. Accessed September 2014.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

New Mexico Bureau of Geology and Mineral Resources (2006) Natural Accumulations of Carbon Dioxide in New Mexico and Adjacent Parts of Colorado and Arizona: Commercial Accumulation of CO₂. Available online at: http://geoinfo.nmt.edu/staff/broadhead/CO2.html#commercial.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

U.S. Environmental Protection Agency (EPA) (2022) Greenhouse Gas Reporting Program (GHGRP). Aggregation of Reported Facility Level Data under Subpart PP -National Level CO₂ Transferred for Food & Beverage Applications for Calendar Years 2010 through 2021. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2015) *Greenhouse Gas Reporting Program Report Verification*. Available online at https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp-verification-factsheet.pdf.

Phosphoric Acid Production

EFMA (2000) "Production of Phosphoric Acid." Best Available Techniques for Pollution Prevention and Control in the European Fertilizer Industry. Booklet 4 of 8. European Fertilizer Manufacturers Association. Available online at: http://www.efma.org/Publications/BAT%202000/Bat04/section04.asp.

Florida Institute of Phosphate Research (FIPR) (2003a) "Analyses of Some Phosphate Rocks." Facsimile Gary Albarelli, Florida Institute of Phosphate Research, Bartow, Florida, to Robert Lanza, ICF International. July 29, 2003.

FIPR (2003b) Florida Institute of Phosphate Research. Personal communication. Mr. Michael Lloyd, Laboratory Manager, FIPR, Bartow, Florida, to Mr. Robert Lanza, ICF International. August 2003.

Golder Associates and M3 Engineering, Bayovar 12 Phosphate Project: NI 43-101 Updated Pre-Feasibility Study, Issued June 28, 2016. Available at:

https://www.sec.gov/Archives/edgar/data/1471603/000121716016000634/focusjune2016bayovar_techrep.htm. Accessed on October 7, 2020.

Jasinski (2012) Personal communication, Stephen Jasinski, U.S. Geological Survey and Mausami Desai, U.S. Environmental Protection Agency. October 12, 2012.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

NCDENR (2013) North Carolina Department of Environment and Natural Resources, Title V Air Permit Review for PCS Phosphate Company, Inc. – Aurora. Available online at:

http://www.ncair.org/permits/permit reviews/PCS rev 08282012.pdf. Accessed on January 25, 2013.

United States Geological Survey (USGS) (2022) Mineral Commodity Summaries: Phosphate Rock 2022. January 2022. U.S. Geological Survey, Reston, VA. Accessed September 2022. Available online at: https://www.usgs.gov/centers/nmic/phosphate-rock-statistics-and-information

USGS (2021a) Mineral Commodity Summaries: Phosphate Rock 2021. January 2021. U.S. Geological Survey, Reston, VA. Accessed August 2021. Available online at: https://www.usgs.gov/centers/nmic/phosphate-rock-statistics-andinformation.

USGS (2021b) Personal communication between Stephen Jasinski (USGS) and Amanda Chiu (EPA) on August 25, 2021.

USGS (2020) Mineral Commodity Summaries: Phosphate Rock 2020. January 2020. U.S. Geological Survey, Reston, VA. Accessed September 2020. Available online at: https://www.usgs.gov/centers/nmic/phosphate-rock-statistics- and-information.

USGS (2019) Mineral Commodity Summaries: Phosphate Rock 2019. February 2019. U.S. Geological Survey, Reston, VA. Accessed August 2019. Available online at: https://www.usgs.gov/centers/nmic/phosphate-rock-statistics-andinformation.

USGS (2019b) Communication between Stephen Jasinski (USGS) and John Steller EPA on November 15, 2019.

USGS (2018) Mineral Commodity Summaries: Phosphate Rock 2018. January 2018. U.S. Geological Survey, Reston, VA. Available online at: https://www.usgs.gov/centers/nmic/phosphate-rock-statistics-and-information.

USGS (2017) Mineral Commodity Summaries: Phosphate Rock 2017. January 2017. U.S. Geological Survey, Reston, VA. Available online at: https://www.usgs.gov/centers/nmic/phosphate-rock-statistics-and-information.

USGS (2016) Mineral Commodity Summaries: Phosphate Rock 2016. January 2016. U.S. Geological Survey, Reston, VA. Available online at: https://www.usgs.gov/centers/nmic/phosphate-rock-statistics-and-information.

USGS (1994 through 2015b) Minerals Yearbook. Phosphate Rock Annual Report. U.S. Geological Survey, Reston, VA.

USGS (2012) Personal communication between Stephen Jasinski (USGS) and Mausami Desai (EPA) on October 12, 2012.

Iron and Steel Production and Metallurgical Coke Production

American Coke and Coal Chemicals Institute (ACCCI) (2021) *U.S. Coke Plants as of November 2021*, ACCCI, Washington, D.C. November 2021.

American Iron and Steel Institute (AISI) (2004 through 2022) *Annual Statistical Report*, American Iron and Steel Institute, Washington, D.C.

Carroll (2016) Personal communication, Colin P. Carroll, Director of Environment, Health and Safety, American Iron and Steel Institute and Mausami Desai, U.S. Environmental Protection Agency, December 2016.

Carroll (2017) Personal communication, Colin P. Carroll, Director of Environment, Health and Safety, American Iron and Steel Institute and John Steller, U.S. Environmental Protection Agency, November 2017.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom996 pp.IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC/UNEP/OECD/IEA (1995) "Volume 3: Greenhouse Gas Inventory Reference Manual. Table 2-2." IPCC Guidelines for National Greenhouse Gas Inventories. Intergovernmental Panel on Climate Change, United Nations Environment Programme, Organization for Economic Co-Operation and Development, International Energy Agency. IPCC WG1 Technical Support Unit, United Kingdom.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

Steiner (2008) Personal communication, Bruce Steiner, Technical Consultant with the American Iron and Steel Institute and Mausami Desai, U.S. Environmental Protection Agency, November 2008.

Tuck (2023) Personal communication, Cris Tuck, Commodity Specialist, U.S. Geological Survey and Amanda Chiu, U.S. Environmental Protection Agency, January 24, 2023.

United States Department of Energy (DOE) (2000) *Energy and Environmental Profile of the U.S. Iron and Steel Industry*. Office of Industrial Technologies, U.S. Department of Energy. August 2000. DOE/EE-0229.EIA.

United States Energy Information Administration (EIA) (1998 through 2019) *Quarterly Coal Report: October-December*, Energy Information Administration, U.S. Department of Energy, Washington, D.C.

U.S. EIA (2021 through 2022) *Quarterly Coal Report: January – March,* Energy Information Administration, U.S. Department of Energy. Washington, D.C.

U.S. EIA (2020) *Natural Gas Annual 2019.* Energy Information Administration, U.S. Department of Energy. Washington, D.C. September 2020.

U.S. EIA (2017b) Monthly Energy Review, December 2017, Energy Information Administration, U.S. Department of Energy, Washington, D.C. DOE/EIA-0035(2015/12).

U.S. EIA (1992) Coal and lignite production. EIA State Energy Data Report 1992, Energy Information Administration, U.S. Department of Energy, Washington, D.C.

United States Environmental Protection Agency (EPA) (2010) Carbon Content Coefficients Developed for EPA's Mandatory Reporting Rule. Office of Air and Radiation, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C.

U.S. EPA (2022). Greenhouse Gas Reporting Program. Dataset as of August 13, 2022. Available online at: https://ghgdata.epa.gov/ghgp/.

United States Geological Survey (USGS) (2022) 2022 Mineral Commodities Summaries: Iron and Steel. U.S. Geological Survey, Reston, VA. January 2022.

USGS (2021) 2021 Mineral Commodities Summaries: Iron and Steel. U.S. Geological Survey, Reston, VA. January 2021.

USGS (2020) 2020 USGS Minerals Yearbook – Iron and Steel Scrap (tables-only release). U.S. Geological Survey, Reston, VA.

USGS (2019) 2019 USGS Minerals Yearbook – Iron and Steel Scrap (tables-only release). U.S. Geological Survey, Reston, VA.

USGS (2018) 2018 USGS Minerals Yearbook – Iron and Steel Scrap (tables-only release). U.S. Geological Survey, Reston, VA.

USGS (2017) 2017 USGS Minerals Yearbook – Iron and Steel. U.S. Geological Survey, Reston, VA.

USGS (1991 through 2017) USGS Minerals Yearbook – Iron and Steel Scrap. U.S. Geological Survey, Reston, VA.

Ferroalloy Production

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Onder, H., and E.A. Bagdoyan (1993) Everything You've Always Wanted to Know about Petroleum Coke. Allis Mineral Systems.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

United States Geological Survey (USGS) (2022a) 2022 Mineral Commodity Summaries: Silicon. U.S. Geological Survey, Reston, VA. January 2022.

USGS (2022b) 2019 Minerals Yearbook: Ferroalloys (tables-only release). U.S. Geological Survey, Reston, VA. June 2022.

USGS (2013a) 2013 Minerals Yearbook: Chromium. U.S. Geological Survey, Reston, VA. March 2016.

USGS (1996 through 2022) Minerals Yearbook: Silicon. U.S. Geological Survey, Reston, VA.

Aluminum Production

EPA (2022) Greenhouse Gas Reporting Program (GHGRP). Envirofacts, Subpart: F Aluminum Production. Available online at:

https://enviro.epa.gov/enviro/ef metadata html.ef metadata table?p table name=F SUBPART LEVEL INFORM ATION&p topic=GHG.

EPA (2015) *Greenhouse Gas Reporting Program Report Verification*. Available online at https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp-verification-factsheet.pdf.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [Calvo Buendia, E., Tanabe, K., Kranjc, A., Baasansuren, J., Fukuda, M., Ngarize, S., Osako, A., Pyrozhenko, Y., Shermanau, P. and Federici, S. (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

USGS (2021) 2020 Mineral Commodity Summaries: Aluminum. U.S. Geological Survey, Reston, VA.

USGS (2020) Mineral Industry Surveys: Aluminum in December 2020. U.S. Geological Survey, Reston VA. December 2020

USGS (2020) 2019 Mineral Commodity Summaries: Aluminum. U.S. Geological Survey, Reston, VA.

USGS (2021) 2019 Mineral Commodity Summaries: Aluminum. U.S. Geological Survey, Reston, VA.

USGS (2022) Mineral Commodity Summaries 2022. U.S. Geological Survey, Reston VA. January 2022USGS (2019) 2017 Mineral Yearbook: Aluminum. U.S. Geological Survey, Reston, VA.USGS (2007) 2006 Mineral Yearbook: Aluminum. U.S. Geological Survey, Reston, VA.USGS (1995, 1998, 2000, 2001, 2002) Minerals Yearbook: Aluminum Annual Report. U.S. Geological Survey, Reston, VA.

Magnesium Production and Processing

ARB (2015) "Magnesium casters successfully retool for a cleaner future." California Air Resources Board News Release. Release # 15-07. February 5, 2015. Accessed October 2017. Available online at: https://www.arb.ca.gov/newsrel/newsrelease.php?id=704.

Bartos S., C. Laush, J. Scharfenberg, and R. Kantamaneni (2007) "Reducing greenhouse gas emissions from magnesium die casting." *Journal of Cleaner Production*, 15: 979-987, March.

EPA (2020) Envirofacts. Greenhouse Gas Reporting Program (GHGRP), Subpart T: Magnesium Production and Processing. Available online at: https://www.epa.gov/enviro/greenhouse-gas-customized-search. Accessed on October 2020.

Gjestland, H. and D. Magers (1996) "Practical Usage of Sulphur [Sulfur] Hexafluoride for Melt Protection in the Magnesium Die Casting Industry." #13, 1996 Annual Conference Proceedings, International Magnesium Association. Ube City, Japan.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Kramer Deborah A. (2000) "Magnesium" U.S. Geological Survey Minerals Yearbook – 2000.

RAND (2002) RAND Environmental Science and Policy Center, "Production and Distribution of SF₀ by End-Use Applications" Katie D. Smythe. International Conference on SF₆ and the Environment: Emission Reduction Strategies. San Diego, CA. November 21-22, 2002.

USGS (1995 through 2022) Minerals Yearbook: Magnesium Annual Report. U.S. Geological Survey, Reston, VA. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/magnesium/index.html#mis.

USGS (2010b) Mineral Commodity Summaries: Magnesium Metal. U.S. Geological Survey, Reston, VA. Available online at: http://minerals.usgs.gov/minerals/pubs/commodity/magnesium/mcs-2010-mgmet.pdf.

USGS (2005b) Personal Communication between Deborah Kramer of the USGS and Jeremy Scharfenberg of ICF Consulting.

Lead Production

Battery Industry (2021). Clarios closing battery recycling center in Florence, South Carolina. Available online at: https://batteryindustry.tech/clarios-closing-battery-recycling-center-in-florence-south-carolina/. Accessed on September 19, 2022.

Dutrizac, J.E., V. Ramachandran, and J.A. Gonzalez (2000) Lead-Zinc 2000. The Minerals, Metals, and Materials Society.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Morris, D., F.R. Steward, and P. Evans (1983) Energy Efficiency of a Lead Smelter. Energy 8(5):337-349.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

Sjardin, M. (2003) CO₂ Emission Factors for Non-Energy Use in the Non-Ferrous Metal, Ferroalloys and Inorganics *Industry*. Copernicus Institute. Utrecht, the Netherlands.

Ullman (1997) Ullman's Encyclopedia of Industrial Chemistry: Fifth Edition. Volume A5. John Wiley and Sons.

United States Geological Survey (USGS) (2022) 2021 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. January 2022.

USGS (2022a) 2019 Minerals Yearbook, Lead - Advance Data Release. U.S. Geological Survey, Reston, VA. October 2022.

USGS (2022b) 2021 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. January 2022.

USGS (2021a) 2017 Minerals Yearbook, Lead – Advance Release. U.S. Geological Survey, Reston, VA. July 2021.

USGS (2021b) 2020 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. February 2021.

USGS (2020) 2019 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. February 2020.

USGS (2019) 2018 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. February 2019.

USGS (2018) 2017 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. January 2018.

USGS (2017) 2016 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. January 2017.

USGS (2016) 2015 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. January 2016.

USGS (2015) 2014 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. January 2015.

USGS (2014) 2013 Mineral Commodity Summary, Lead. U.S. Geological Survey, Reston, VA. February 2014.

USGS (1995 through 2013) Minerals Yearbook: Lead Annual Report. U.S. Geological Survey, Reston, VA.

Zinc Production

American Zinc Recycling (AZR) (2021) Summary of Company History. Available online at https://azr.com/our-history/. Accessed on March 16, 2021.

AZR (2020) Personal communication. Erica Livingston, American Zinc Recycling and Amanda Chiu, U.S. Environmental Protection Agency. October 29, 2020.

American Zinc Products (AZP) (2021) American Zinc Products Marks First Anniversary of Zinc Production. Available online at https://americanzincproducts.com/american-zinc-products-marks-first-anniversary-of-zinc-production/. Accessed on March 1, 2022.

Befesa (2022) Personal communication. Eric Hunsberger, Befesa Zinc US Inc. and Amanda Chiu, U.S. Environmental Protection Agency. November 8, 2022.

Horsehead Corp. (2016) Form 10-K, Annual Report for the Fiscal Year Ended December 31, 2015. Available online at: https://www.sec.gov/Archives/edgar/data/1385544/000119312516725704/d236839d10k.htm. Submitted on January 25, 2017.

Horsehead Corp. (2015) Form 10-K, Annual Report for the Fiscal Year Ended December 31, 2014. Available online at: http://www.sec.gov/Archives/edgar/data/1385544/000138554415000005/zinc-2014123110k.htm. Submitted on March 2, 2015.

Horsehead Corp. (2014) Form 10-K, Annual Report for the Fiscal Year Ended December 31, 2013. Available online at: http://www.sec.gov/Archives/edgar/data/1385544/000138554414000003/zinc-2013123110k.htm. Submitted on March 13, 2014.

Horsehead Corp. (2013) Form 10-K, Annual Report for the Fiscal Year Ended December 31, 2012. Available online at: http://www.sec.gov/Archives/edgar/data/1385544/000119312513110431/0001193125-13-110431-index.htm. Submitted March 18, 2013.

Horsehead Corp. (2012a) Form 10-K, Annual Report for the Fiscal Year Ended December 31, 2011. Available online at: http://www.sec.gov/Archives/edgar/data/1385544/000119312512107345/d293011d10k.htm. Submitted on March 9, 2012.

Horsehead Corp. (2012b) *Horsehead's New Zinc Plant and its Impact on the Zinc Oxide Business.* February 22, 2012. Available online at: http://www.horsehead.net/downloadAttachmentNDO.php?ID=118. Accessed on September 10, 2015.

Horsehead Corp. (2011) 10-K Annual Report for the Fiscal Year Ended December 31, 2010. Available online at: http://google.brand.edgar-online.com/default.aspx?sym=zinc. Submitted on March 16, 2011.

Horsehead Corp. (2010a) 10-K Annual Report for the Fiscal Year Ended December 31, 2009. Available online at: http://google.brand.edgar-online.com/default.aspx?sym=zinc. Submitted on March 16, 2010.

Horsehead Corp. (2010b) *Horsehead Holding Corp. Provides Update on Operations at its Monaca, PA Plant.* July 28, 2010. Available online at: http://www.horsehead.net/pressreleases.php?showall=no&news=&ID=65.

Horsehead Corp (2009) 10-K Annual Report for the Fiscal Year Ended December 31, 2008. Available online at: https://www.sec.gov/Archives/edgar/data/1385544/000095015209002674/l35087ae10vk.htm. Submitted on March 16, 2009.

Horsehead Corp (2008) 10-K Annual Report for the Fiscal Year Ended December 31, 2007. Available online at: http://google.brand.edgar-online.com/default.aspx?sym=zinc. Submitted on March 31, 2008.

Horsehead Corp (2007) Registration Statement (General Form) S-1. Available online at http://google.brand.edgaronline.com/default.aspx?sym=zinc. Submitted on April 13, 2007.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Nyrstar (2019) 2018 Clarksville Fact Sheet. Available online at:

http://www.nyrstar.com/~/media/Files/N/Nyrstar/operations/melting/fact-sheet-clarksville-en.pdf. Accessed on September 27, 2017.

PIZO (2012) Available online at http://pizotech.com/index.html. Accessed on October 10, 2012.

PIZO (2021) Personal communication. Thomas Rheaume, Arkansas Department of Energy and Environment and Amanda Chiu, U.S. Environmental Protection Agency. February 16, 2021.

Recycling Today (2020) "AZR to restart for zinc recycling plant in North Carolina." March 6, 2020. https://www.recyclingtoday.com/article/american-zinc-recycling-restarting-north-carolina-plant-2020/. Accessed October 10, 2020.

Recycling Today (2017) "Horsehead announces corporate name change to American Zinc Recycling." May 3, 2017. https://www.recyclingtoday.com/article/horsehead-changes-name-american-zinc-recycling/. Accessed September 19, 2022.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

Steel Dust Recycling (SDR) (2022) Personal communication. Jeremy Whitten, Steel Dust Recycling LLC and Amanda Chiu, U.S. Environmental Protection Agency. October 10, 2022.

SDR (2021) Personal communication. Jeremy Whitten, Steel Dust Recycling LLC and Amanda Chiu, U.S. Environmental Protection Agency. January 8, 2021.

SDR (2018) Personal communication. Jeremy Whitten, Steel Dust Recycling LLC and John Steller, U.S. Environmental Protection Agency. October 25, 2018.

SDR (2017) Personal communication. Jeremy Whitten, Steel Dust Recycling LLC and John Steller, U.S. Environmental Protection Agency. January 26, 2017.

SDR (2015) Personal communication. Jeremy Whitten, Steel Dust Recycling LLC and Gopi Manne, Eastern Research Group, Inc. September 22, 2015.

SDR (2014) Personal communication. Art Rowland, Steel Dust Recycling LLC and Gopi Manne, Eastern Research Group, Inc. December 9, 2014.

SDR (2013) Available online at http://steeldust.com/home.htm. Accessed on October 29, 2013.

SDR (2012) Personal communication. Art Rowland, Steel Dust Recycling LLC and Gopi Manne, Eastern Research Group, Inc. October 5, 2012.

Sjardin (2003) CO₂ Emission Factors for Non-Energy Use in the Non-Ferrous Metal, Ferroalloys and Inorganics *Industry*. Copernicus Institute. Utrecht, the Netherlands.

United States Environmental Protection Agency (EPA) (1992) "Applications Analysis Report: Horsehead Resource Development Company Inc., Flame Reactor Technology" EPA/540/A5-91/005. May 1992.

United States Geological Survey (USGS) (2022) 2022 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2022. Available online at: https://pubs.usgs.gov/periodicals/mcs2022/mcs2022-zinc.pdf.

USGS (2021) 2021 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2021.

USGS (2020) 2020 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2020.

USGS (2019) 2019 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2019.

USGS (2018) 2018 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2018.

USGS (2017) 2017 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2017.

USGS (2016) 2016 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2016.

USGS (2015) 2015 Mineral Commodity Summary: Zinc. U.S. Geological Survey, Reston, VA. January 2015.

USGS (1995 through 2014) Minerals Yearbook: Zinc Annual Report. U.S. Geological Survey, Reston, VA.

Viklund-White (2000) *The use of LCA for the environmental evaluation of the recycling of galvanized steel.* ISIJ International, Vol. 40. No. 3, pp 292-299.

Electronics Industry

Burton, C.S., and R. Beizaie (2001) "EPA's PFC Emissions Model (PEVM) v. 2.14: Description and Documentation" prepared for Office of Global Programs, U. S. Environmental Protection Agency, Washington, DC. November 2001.

Citigroup Smith Barney (2005) Global Supply/Demand Model for Semiconductors. March 2005.

DisplaySearch (2010) DisplaySearch Q4'09 Quarterly FPD Supply/Demand and Capital Spending Report. DisplaySearch, LLC.

Doering, R. and Nishi, Y (2000) "Handbook of Semiconductor Manufacturing Technology", Marcel Dekker, New York, USA, 2000.

EPA (2006) *Uses and Emissions of Liquid PFC Heat Transfer Fluids from the Electronics Sector.* U.S. Environmental Protection Agency, Washington, DC. EPA-430-R-06-901.

EPA (2010) Technical Support Document for Process Emissions from Electronics Manufacture (e.g., Micro-Electro-Mechanical Systems, Liquid Crystal Displays, Photovoltaics, and Semiconductors). U.S. Environmental Protection Agency, Washington, DC.

EPA Greenhouse Gas Reporting Program (GHGRP) Envirofacts. Subpart I: Electronics Manufacture. Available online at: https://enviro.epa.gov/facts/ghg/search.html.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. Calvo Buendia, E., Tanabe, K., Kranjc, A., Baasansuren, J., Fukuda, M., Ngarize, S., Osako, A., Pyrozhenko, Y., Shermanau, P. and Federici, S. (eds). Published: IPCC, Switzerland.

ITRS (2007, 2008, 2011, 2013) International Technology Roadmap for Semiconductors: 2006 Update, January 2007; International Technology Roadmap for Semiconductors: 2007 Edition, January 2008; International Technology Roadmap for Semiconductors: 2011, January 2012; Update, International Technology Roadmap for Semiconductors: 2013 Edition, Available online at: https://www.semiconductors.org/resources/2007-international-technology-roadmap-for-semiconductors-itrs/. These and earlier editions and updates are available online at: https://www.semiconductors.org/resources/?fwp resource types=utilization-reports&fwp paged=2. Information

about the number of interconnect layers for years 1990-2010 is contained in Burton and Beizaie, 2001. PEVM is updated using new editions and updates of the ITRS, which are published annually. SEMI - Semiconductor Equipment and Materials Industry (2017) World Fab Forecast, August 2018 Edition.

Platzer, Michaela D. (2015) U.S. Solar Photovoltaic Manufacturing: Industry Trends, Global Competition, Federal Support. Congressional Research Service. January 27, 2015. https://fas.org/sgp/crs/misc/R42509.pdf.

SEMI – Semiconductor Equipment and Materials Industry (2021) World Fab Forecast, June 2021 Edition.

SEMI - Semiconductor Equipment and Materials Industry (2018) World Fab Forecast, June 2018 Edition.

SEMI - Semiconductor Equipment and Materials Industry (2016) World Fab Forecast, May 2017 Edition.

SEMI - Semiconductor Equipment and Materials Industry (2013) World Fab Forecast, May 2013 Edition.

SEMI - Semiconductor Equipment and Materials Industry (2012) World Fab Forecast, August 2012 Edition.

Semiconductor Industry Association (SIA) (2009-2011) STATS: SICAS Capacity and Utilization Rates Q1-Q4 2008, Q1-Q4 2009, Q1-Q4 2010. Available online at:

http://www.semiconductors.org/industry statistics/semiconductor capacity utilization sicas reports/.

United States Census Bureau (USCB) (2011, 2012, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021) Historical Data: Quarterly Survey of Plant Capacity Utilization. Available online at: https://www.census.gov/programssurveys/qpc.html.

VLSI Research, Inc. (2012) Worldwide Silicon Demand. August 2012.

Substitution of Ozone Depleting Substances

Carrier (2023) New Carrier AquaSnap 30RC Air Cooled Chiller Helps Maximize Building Space while Delivering Efficiency and Sustainability, January 10, 2023. Available online at:

https://www.carrier.com/commercial/en/us/news/news-article/new-carrier-aquasnap-30rc-air-cooled-chillerhelps-maximize-building-space-while-delivering-efficiency-and-sustainability.html

EPA (2022a) Summary of Updates to the Unitary Air-conditioning End-uses in the Vintaging Model. Prepared for U.S. EPA's Stratospheric Protection Division by ICF under EPA Contract Number 68HERH19D0029.

EPA (2022b) Summary of Updates to the Road Transport and Modern Rail Car End-uses in the Vintaging Model. Prepared for U.S. EPA's Stratospheric Protection Division by ICF under EPA Contract Number 68HERH19D0029.

EPA (2018) EPA's Vintaging Model of ODS Substitutes: A Summary of the 2017 Peer Review. Office of Air and Radiation. Document Number EPA-400-F-18-001. Available online at:

https://www.epa.gov/sites/production/files/2018-09/documents/epas-vintaging-model-of-ods-substitutes-peerreview-factsheet.pdf.

Hu et al. (2022) U.S. non-CO₂ greenhouse gas (GHG) emissions for 2007 – 2020 derived from atmospheric observations. American Geophysical Union. December 2022. Abstract available online at: https://agu.confex.com/agu/fm22/meetingapp.cgi/Paper/1112748.

Hu et al. (2017) Considerable Contribution of the Montreal Protocol to Declining Greenhouse Gas Emissions from the United States, Geophys. Res. Lett., 44, 8075-8083, doi:10.1002/2017GL074388, August 14, 2017.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Electrical Transmission and Distribution

EPA (2022) *Inventory of U.S. Greenhouse Gas Emissions and Sinks:* 1990-2020. EPA 430-R-22-003. Available online at: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2020.

Harnisch and Eisenhauer, "Natural CF₄ and SF₆ on Earth," GEOPHYSICAL RESEARCH LETTERS, VOL. 25, NO.13, PAGES 2401-2404, JULY 1, 1998. https://agupubs.onlinelibrary.wiley.com/doi/pdf/10.1029/98GL01779

HIFLD (2019) Federal Energy Regulatory Commission. Homeland Infrastructure Foundation-Level Data (HIFLD). 2019. Accessed March 2021. Available online at: https://hifld-geoplatform.opendata.arcgis.com/datasets/electric-power-transmission-lines.

HIFLD (2020) Federal Energy Regulatory Commission. Homeland Infrastructure Foundation-Level Data (HIFLD). 2020. Accessed October 2021. Available online at: https://hifld-geoplatform.opendata.arcgis.com/datasets/electric-power-transmission-lines/explore?showTable=true.

HIFLD (2021) Federal Energy Regulatory Commission. Homeland Infrastructure Foundation-Level Data (HIFLD). 2021. Accessed September 2022. Available online at: https://hifld-geoplatform.opendata.arcgis.com/datasets/electric-power-transmission-lines.

Hu, L., Ottinger, D., Bogle, S., Montzka, S., DeCola, P., Dlugokencky, E., Andrews, A., Thoning, K., Sweeney, C., Dutton, G., Aepli, L., and Crotwell, A. (2022). "Declining, seasonal-varying emissions of sulfur hexafluoride from the United States point to a new mitigation opportunity." *EGUsphere* [preprint]. Available online at: https://doi.org/10.5194/egusphere-2022-862.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.). Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

IPCC (1996) Climate Change 1995: The Science of Climate Change. Intergovernmental Panel on Climate Change, J.T. Houghton, L.G. Meira Filho, B.A. Callander, N. Harris, A. Kattenberg, and K. Maskell (eds.). Cambridge University Press. Cambridge, United Kingdom.

Levin et al. (2010) "The Global SF₆ Source Inferred from Long-term High Precision Atmospheric Measurements and its Comparison with Emission Inventories." *Atmospheric Chemistry and Physics*, 10: 2655–2662.

Middleton, B. (2000) *Cold Weather Applications of Gas Mixture (SF₆/N₂, SF₆/CF₄) Circuit Breakers: A User Utility's Perspective* [Conference Presentation]. The U.S. Environmental Protection Agency's Conference on SF₆ and the Environment: Emission Reduction Strategies, San Diego, CA, United States. Available online at: https://www.epa.gov/sites/default/files/2016-02/documents/conf00 middleton.pdf

O'Connell, P., F. Heil, J. Henriot, G. Mauthe, H. Morrison, L. Neimeyer, M. Pittroff, R. Probst, J.P. Tailebois (2002) SF₆ in the Electric Industry, Status 2000, CIGRE. February 2002.

Ottinger D, Averyt, M. & Harris, D. (2014). Trends in emissions of fluorinated GHGs reported under the Greenhouse Gas Reporting Program: Patterns and potential causes. Submitted to the Seventh International Symposium on Non-CO₂ Greenhouse Gases (NCGG-7), Amsterdam, Netherlands.

RAND (2004) "Trends in SF₆ Sales and End-Use Applications: 1961-2003," Katie D. Smythe. International Conference on SF₆ and the Environment: Emission Reduction Strategies. RAND Environmental Science and Policy Center, Scottsdale, AZ. December 1-3, 2004.

UDI (2017) 2017 UDI Directory of Electric Power Producers and Distributors, 125th Edition, Platts.

UDI (2013) 2013 UDI Directory of Electric Power Producers and Distributors, 121st Edition, Platts.

UDI (2010) 2010 UDI Directory of Electric Power Producers and Distributors, 118th Edition, Platts.

UDI (2007) 2007 UDI Directory of Electric Power Producers and Distributors, 115th Edition, Platts.

UDI (2004) 2004 UDI Directory of Electric Power Producers and Distributors, 112th Edition, Platts.

UDI (2001) 2001 UDI Directory of Electric Power Producers and Distributors, 109th Edition, Platts.

UNFCCC (2014) Report of the Conference of the Parties on its nineteenth session, held in Warsaw from 11 to 23 November 2013. United Nations Framework Convention on Climate Change, Warsaw. (FCCC/CP/2013/10/Add.3). January 31, 2014. Available online at: http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

Nitrous Oxide from Product Use

CGA (2003) "CGA Nitrous Oxide Abuse Hotline: CGA/NWSA Nitrous Oxide Fact Sheet." Compressed Gas Association. November 3, 2003.

CGA (2002) "CGA/NWSA Nitrous Oxide Fact Sheet." Compressed Gas Association. March 25, 2002.

Heydorn, B. (1997) "Nitrous Oxide—North America." Chemical Economics Handbook, SRI Consulting. May 1997.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Ottinger (2021) Personal communication. Deborah Ottinger, U.S. Environmental Protection Agency and Amanda Chiu, U.S. Environmental Protection Agency. January 7, 2021.

RTI (2023) Expert judgment, RTI International. March 30, 2023.

Tupman, M. (2002) Personal communication. Martin Tupman, Airgas Nitrous Oxide and Laxmi Palreddy, ICF International. July 3, 2002.

Industrial Processes and Product Use Sources of Precursor Greenhouse Gases

EPA (2023a) "Criteria pollutants National Tier 1 for 1970 - 2022." National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data. Office of Air Quality Planning and Standards, March 2023. Available online at: https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data.

EPA (2023b) "2020 National Emissions Inventory Technical Support Document: Introduction." Office of Air Quality Planning and Standards, March 2023. Available online at: https://www.epa.gov/system/files/documents/2023-01/NEI2020 TSD Section1 Introduction.pdf

Agriculture

Enteric Fermentation

Archibeque, S. (2011) Personal Communication. Shawn Archibeque, Colorado State University, Fort Collins, Colorado and staff at ICF International.

Crutzen, P.J., I. Aselmann, and W. Seiler (1986) Methane Production by Domestic Animals, Wild Ruminants, Other Herbivores, Fauna, and Humans. Tellus, 38B:271-284.

Donovan, K. (1999) Personal Communication. Kacey Donovan, University of California at Davis and staff at ICF International.

Doren, P.E., J. F. Baker, C. R. Long and T. C. Cartwright (1989) Estimating Parameters of Growth Curves of Bulls, J Animal Science 67:1432-1445.

Enns, M. (2008) Personal Communication. Dr. Mark Enns, Colorado State University and staff at ICF International.

EPA (2002) Quality Assurance/Quality Control and Uncertainty Management Plan for the U.S. Greenhouse Gas Inventory: Procedures Manual for Quality Assurance/Quality Control and Uncertainty Analysis, U.S. Greenhouse Gas Inventory Program, U.S. Environmental Protection Agency, Office of Atmospheric Programs, EPA 430-R-02-007B, June 2002.

ERG (2021) Updated Other Animal Population Distribution Methodology. ERG, Lexington, MA.

ERG (2016) Development of Methane Conversion Rate Scaling Factor and Diet-Related Inputs to the Cattle Enteric Fermentation Model for Dairy Cows, Dairy Heifers, and Feedlot Animals. ERG, Lexington, MA. December 2016.

Galyean and Gleghorn (2001) Summary of the 2000 Texas Tech University Consulting Nutritionist Survey. Texas Tech University. Available online at http://www.depts.ttu.edu/afs/burnett center/progress reports/bc12.pdf. June 2009.

Holstein Association (2010) History of the Holstein Breed (website). Available online at: http://www.holsteinusa.com/holstein breed/breedhistory.html. Accessed September 2010.

ICF (2006) Cattle Enteric Fermentation Model: Model Documentation. Prepared by ICF International for the Environmental Protection Agency. June 2006.

ICF (2003) Uncertainty Analysis of 2001 Inventory Estimates of Methane Emissions from Livestock Enteric Fermentation in the U.S. Memorandum from ICF International to the Environmental Protection Agency. May 2003.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the *Fourth Assessment Report* of the Intergovernmental Panel on Climate Change. S. Solomon, D. Qin, M. Manning, Z. Chen,

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The Intergovernmental Panel on Climate Change. Calvo Buendia, E., Tanabe, K., Kranjc, A., Baasansuren, J., Fukuda, M., Ngarize, S., Osako, A., Pyrozhenko, Y., Shermanau, P. and Federici, S. (eds). Hayama, Kanagawa, Japan. Johnson, D. (2002) Personal Communication. Don Johnson, Colorado State University, Fort Collins, and ICF International.

Johnson, D. (1999) Personal Communication. Don Johnson, Colorado State University, Fort Collins, and David Conneely, ICF International.

Kebreab E., K. A. Johnson, S. L. Archibeque, D. Pape, and T. Wirth (2008) Model for estimating enteric methane emissions from United States dairy and feedlot cattle. J. Anim. Sci. 86: 2738-2748.

Lippke, H., T. D. Forbes, and W. C. Ellis. (2000) Effect of supplements on growth and forage intake by stocker steers grazing wheat pasture. J. Anim. Sci. 78:1625-1635.

National Bison Association (1999) Total Bison Population—1999. Report provided during personal email communication with Dave Carter, Executive Director, National Bison Association, July 19, 2011.

Pinchak, W.E., D. R. Tolleson, M. McCloy, L. J. Hunt, R. J. Gill, R. J. Ansley, and S. J. Bevers (2004) Morbidity effects on productivity and profitability of stocker cattle grazing in the southern plains. J. Anim. Sci. 82:2773-2779.

Platter, W. J., J. D. Tatum, K. E. Belk, J. A. Scanga, and G. C. Smith (2003) Effects of repetitive use of hormonal implants on beef carcass quality, tenderness, and consumer ratings of beef palatability. J. Anim. Sci. 81:984-996.

Preston, R.L. (2010) What's The Feed Composition Value of That Cattle Feed? Beef Magazine, March 1, 2010. Available at: http://beefmagazine.com/nutrition/feed-composition-tables/feed-composition-value-cattle--0301.

Skogerboe, T. L., L. Thompson, J. M. Cunningham, A. C. Brake, V. K. Karle (2000) The effectiveness of a single dose of doramectin pour-on in the control of gastrointestinal nematodes in yearling stocker cattle. Vet. Parasitology 87:173-181.

Soliva, C.R. (2006) Report to the attention of IPCC about the data set and calculation method used to estimate methane formation from enteric fermentation of agricultural livestock population and manure management in Swiss agriculture. On behalf of the Federal Office for the Environment (FOEN), Berne, Switzerland.

U.S. Department of Agriculture (USDA) (2022) Quick Stats: Agricultural Statistics Database. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. Available online at http://quickstats.nass.usda.gov/. Accessed July 2022.

U.S. Department of Agriculture (USDA) (2021a) Quick Stats: Agricultural Statistics Database. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. Available online at http://quickstats.nass.usda.gov/. Accessed May-June 2021.

USDA (2021b) Economic Research Service Dairy Data. Available online at: https://www.ers.usda.gov/dataproducts/dairy-data/. Accessed May 2021.

USDA (2019) 1987, 1992, 1997, 2002, 2007, 2012, and 2017 Census of Agriculture. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. Available online at: https://www.nass.usda.gov/AgCensus/index.php. May 2019.

USDA (1996) Beef Cow/Calf Health and Productivity Audit (CHAPA): Forage Analyses from Cow/Calf Herds in 18 States. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. Available online at http://www.aphis.usda.gov/vs/ceah/cahm. March 1996.

USDA:APHIS:VS (2010) Beef 2007–08, Part V: Reference of Beef Cow-calf Management Practices in the United States, 2007–08. USDA–APHIS–VS, CEAH. Fort Collins, CO.

USDA:APHIS:VS (2002) Reference of 2002 Dairy Management Practices. USDA–APHIS–VS, CEAH. Fort Collins, CO. Available online at http://www.aphis.usda.gov/vs/ceah/cahm.

USDA:APHIS:VS (1998) Beef '97, Parts I-IV. USDA—APHIS—VS, CEAH. Fort Collins, CO. Available online at http://www.aphis.usda.gov/animal-health/nahms/beefcowcalf/index.shtml#beef97.

USDA:APHIS:VS (1996) Reference of 1996 Dairy Management Practices. USDA–APHIS–VS, CEAH. Fort Collins, CO. Available online at http://www.aphis.usda.gov/vs/ceah/cahm.

USDA:APHIS:VS (1994) Beef Cow/Calf Health and Productivity Audit. USDA–APHIS–VS, CEAH. Fort Collins, CO. Available online at http://www.aphis.usda.gov/vs/ceah/cahm.

USDA:APHIS:VS (1993) Beef Cow/Calf Health and Productivity Audit. USDA-APHIS-VS, CEAH. Fort Collins, CO. August 1993. Available online at http://www.aphis.usda.gov/vs/ceah/cahm.

Vasconcelos and Galyean (2007) Nutritional recommendations of feedlot consulting nutritionists: The 2007 Texas Tech University Study. J. Anim. Sci. 85:2772-2781.

Manure Management

ASAE (1998) ASAE Standards 1998, 45th Edition. American Society of Agricultural Engineers. St. Joseph, MI.

Bryant, M.P., V.H. Varel, R.A. Frobish, and H.R. Isaacson (1976) In H.G. Schlegel (ed.)]; Seminar on Microbial Energy Conversion. E. Goltz KG. Göttingen, Germany.

Bush, E. (1998) Personal communication with Eric Bush, Centers for Epidemiology and Animal Health, U.S. Department of Agriculture regarding National Animal Health Monitoring System's (NAHMS) Swine '95 Study.

EPA (2021) AgSTAR Anaerobic Digester Database. Available online at: https://www.epa.gov/agstar/livestock-anaerobic-digester-database. Accessed September 2021.

EPA (2008) Climate Leaders Greenhouse Gas Inventory Protocol Offset Project Methodology for Project Type Managing Manure with Biogas Recovery Systems.

EPA (2005) National Emission Inventory—Ammonia Emissions from Animal Agricultural Operations, Revised Draft Report. U.S. Environmental Protection Agency. Washington, D.C. April 22, 2005.

EPA (2002a) Development Document for the Final Revisions to the National Pollutant Discharge Elimination System (NPDES) Regulation and the Effluent Guidelines for Concentrated Animal Feeding Operations (CAFOS). U.S. Environmental Protection Agency. EPA-821-R-03-001. December 2002.

EPA (2002b) Cost Methodology for the Final Revisions to the National Pollutant Discharge Elimination System Regulation and the Effluent Guidelines for Concentrated Animal Feeding Operations. U.S. Environmental Protection Agency. EPA-821-R-03-004. December 2002.

EPA (1992) Global Methane Emissions from Livestock and Poultry Manure, Office of Air and Radiation, U.S. Environmental Protection Agency. February 1992.

ERG (2021) Updated Other Animal Population Distribution Methodology. Memorandum to EPA from ERG.

ERG (2019) "Incorporation of USDA 2016 ARMS Dairy Data into the Manure Management Greenhouse Gas Inventory." Memorandum to USDA OCE and EPA from ERG, December 2019.

ERG (2018) "Incorporation of USDA 2009 ARMS Swine Data into the Manure Management Greenhouse Gas Inventory." Memorandum to USDA OCE and EPA from ERG, November 2018.

ERG (2010a) "Typical Animal Mass Values for Inventory Swine Categories." Memorandum to EPA from ERG. July 19, 2010.

ERG (2010b) Telecon with William Boyd of USDA NRCS and Cortney Itle of ERG Concerning Updated VS and Nex Rates. August 8, 2010.

ERG (2010c) "Updating Current Inventory Manure Characteristics new USDA Agricultural Waste Management Field Handbook Values." Memorandum to EPA from ERG. August 13, 2010.

ERG (2008) "Methodology for Improving Methane Emissions Estimates and Emission Reductions from Anaerobic Digestion System for the 1990-2007 Greenhouse Gas Inventory for Manure Management." Memorandum to EPA from ERG. August 18, 2008.

ERG (2003a) "Methodology for Estimating Uncertainty for Manure Management Greenhouse Gas Inventory." Contract No. GS-10F-0036, Task Order 005. Memorandum to EPA from ERG, Lexington, MA. September 26, 2003.

ERG (2003b) "Changes to Beef Calves and Beef Cows Typical Animal Mass in the Manure Management Greenhouse Gas Inventory." Memorandum to EPA from ERG, October 7, 2003.

ERG (2001) Summary of development of MDP Factor for methane conversion factor calculations. ERG, Lexington, MA. September 2001.

ERG (2000a) Calculations: Percent Distribution of Manure for Waste Management Systems. ERG, Lexington, MA. August 2000.

ERG (2000b) Discussion of Methodology for Estimating Animal Waste Characteristics (Summary of Bo Literature Review). ERG, Lexington, MA. June 2000.

Groffman, P.M., R. Brumme, K. Butterbach-Bahl, K.E. Dobbie, A.R. Mosier, D. Ojima, H. Papen, W.J. Parton, K.A. Smith, and C. Wagner-Riddle (2000) "Evaluating annual nitrous oxide fluxes at the ecosystem scale." Global Biogeochemical Cycles, 14(4):1061-1070.

Hashimoto, A.G. (1984) "Methane from Swine Manure: Effect of Temperature and Influent Substrate Composition on Kinetic Parameter (k)." Agricultural Wastes, 9:299-308.

Hashimoto, A.G., V.H. Varel, and Y.R. Chen (1981) "Ultimate Methane Yield from Beef Cattle Manure; Effect of Temperature, Ration Constituents, Antibiotics and Manure Age." Agricultural Wastes, 3:241-256.

Hill, D.T. (1984) "Methane Productivity of the Major Animal Types." Transactions of the ASAE, 27(2):530-540.

Hill, D.T. (1982) "Design of Digestion Systems for Maximum Methane Production." Transactions of the ASAE, 25(1):226-230.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [CalvoBuendia, E., Tanabe, K., Kranjc, A., Baasansuren, J., Fukuda, M., Ngarize S., Osako, A., Pyrozhenko, Y., Shermanau, P. and Federici, S. (eds)]. Switzerland.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Morris, G.R. (1976) Anaerobic Fermentation of Animal Wastes: A Kinetic and Empirical Design Fermentation. M.S. Thesis. Cornell University.

National Bison Association (1999) Total Bison Population—1999. Report provided during personal email communication with Dave Carter, Executive Director, National Bison Association July 19, 2011.

Ott, S.L. (2000) Dairy '96 Study. Stephen L. Ott, Animal and Plant Health Inspection Service, U.S. Department of Agriculture. June 19, 2000.

Robertson, G. P. and P. M. Groffman (2015) Nitrogen transformations. Soil Microbiology, Ecology, and Biochemistry, pages 421-446. Academic Press, Burlington, Massachusetts, USA.

Safley, L.M., Jr. (2000) Personal Communication. Deb Bartram, ERG and L.M. Safley, President, Agri-Waste Technology. June and October 2000.

Sweeten, J. (2000) Personal Communication. John Sweeten, Texas A&M University and Indra Mitra, ERG. June 2000.

UEP (1999) Voluntary Survey Results—Estimated Percentage Participation/Activity. Caged Layer Environmental Management Practices, Industry data submissions for EPA profile development, United Egg Producers and National Chicken Council. Received from John Thorne, Capitolink. June 2000.

USDA (2022) Quick Stats: Agricultural Statistics Database. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. Available online at: http://quickstats.nass.usda.gov/.

USDA (2021a) Quick Stats: Agricultural Statistics Database. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. Available online at: http://quickstats.nass.usda.gov/.

USDA (2021b) Chicken and Eggs 2020 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. February 2021. Available online at:

http://www.nass.usda.gov/Publications/index.asp.

USDA (2021c) Poultry - Production and Value 2020 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2021. Available online at: http://www.nass.usda.gov/Publications/index.asp.

USDA (2019b) Chicken and Eggs 2018 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. February 2019. Available online at: http://www.nass.usda.gov/Publications/index.php.

USDA (2019b) Poultry - Production and Value 2018 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2019. Available online at: http://www.nass.usda.gov/Publications/index.php.

USDA (2019c) Chicken and Eggs 2013-2017 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. June 2019. Available online at: http://www.nass.usda.gov/Publications/index.php.

USDA (2019d) 1987, 1992, 1997, 2002, 2007, 2012, and 2017 Census of Agriculture. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. Available online at: https://www.nass.usda.gov/AgCensus/index.php. May 2019.

USDA (2018) Poultry - Production and Value 2017 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2018. Available online at: http://www.nass.usda.gov/Publications/index.php.

USDA (2017) Poultry - Production and Value 2016 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2017. Available online at: http://www.nass.usda.gov/Publications/index.php.

USDA (2016) Poultry - Production and Value 2015 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2016. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2015) Poultry - Production and Value 2014 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2015. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2014) Poultry - Production and Value 2013 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2014. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2013a) Chicken and Eggs 2012 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. February 2013. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2013b) Poultry - Production and Value 2012 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2013. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2012a) Chicken and Eggs 2011 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. February 2012. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2012b) Poultry - Production and Value 2011 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2012. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2011a) Chicken and Eggs 2010 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. February 2011. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2011b) Poultry - Production and Value 2010 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2011. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2010a) Chicken and Eggs 2009 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. February 2010. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2010b) Poultry - Production and Value 2009 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2010. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2009a) Chicken and Eggs 2008 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. February 2009. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2009b) Poultry - Production and Value 2008 Summary. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2009. Available online at:

http://www.nass.usda.gov/Publications/index.php.

USDA (2009c) Chicken and Eggs – Final Estimates 2003-2007. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. March 2009. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (2009d) Poultry Production and Value—Final Estimates 2003-2007. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. May 2009. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (2008) Agricultural Waste Management Field Handbook, National Engineering Handbook (NEH), Part 651. Natural Resources Conservation Service, U.S. Department of Agriculture.

USDA (2004a) Chicken and Eggs—Final Estimates 1998-2003. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2004. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (2004b) Poultry Production and Value—Final Estimates 1998-2002. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. April 2004. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (1999) Poultry Production and Value—Final Estimates 1994-97. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. March 1999. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (1998) Chicken and Eggs—Final Estimates 1994-97. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. December 1998. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (1996) Agricultural Waste Management Field Handbook, National Engineering Handbook (NEH), Part 651. Natural Resources Conservation Service, U.S. Department of Agriculture. July 1996.

USDA (1995a) Poultry Production and Value—Final Estimates 1988-1993. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. March 1995. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (1995b) Chicken and Eggs—Final Estimates 1988-1993. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. December 1995. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA (1994) Sheep and Goats—Final Estimates 1989-1993. National Agriculture Statistics Service, U.S. Department of Agriculture. Washington, D.C. January 31, 1994. Available online at: https://www.nass.usda.gov/Publications/index.php.

USDA APHIS (2003) Sheep 2001, Part I: Reference of Sheep Management in the United States, 2001 and Part IV: Baseline Reference of 2001 Sheep Feedlot Health and Management. USDA-APHIS-VS. Fort Collins, CO. #N356.0702. Available online at http://www.aphis.usda.gov/animal health/nahms/sheep/index.shtml#sheep2001.

USDA APHIS (2000) Layers '99—Part II: References of 1999 Table Egg Layer Management in the U.S. USDA-APHIS-VS. Fort Collins, CO. Available online at

http://www.aphis.usda.gov/animal health/nahms/poultry/downloads/layers99/Layers99 dr PartII.pdf.

USDA APHIS (1996) Swine '95: Grower/Finisher Part II: Reference of 1995 U.S. Grower/Finisher Health & Management Practices. USDA-APHIS-VS. Fort Collins, CO. Available online at: http://www.aphis.usda.gov/animal health/nahms/swine/downloads/swine95/Swine95 dr PartII.pdf.

Rice Cultivation

Baicich, P. (2013) The Birds and Rice Connection. *Bird Watcher's Digest*. Available online at: http://www.usarice.com/doclib/194/6867.pdf.

Brockwell, P.J., and R.A. Davis (2016) Introduction to time series and forecasting. Springer.

Cantens, G. (2004 through 2005) Personal Communication. Janet Lewis, Assistant to Gaston Cantens, Vice President of Corporate Relations, Florida Crystals Company and ICF International.

Cheng, K., S.M. Ogle, W.J. Parton, G. Pan. (2014) "Simulating greenhouse gas mitigation potentials for Chinese croplands using the DAYCENT ecosystem model." Global Change Biology 20:948-962.

Cheng, K., S.M. Ogle, W.J. Parton and G. Pan. (2013) "Predicting methanogenesis from rice paddies using the DAYCENT ecosystem model." Ecological Modelling 261-262:19-31.

Del Grosso, S.J., S.M. Ogle, W.J. Parton, and F.J. Breidt (2010) "Estimating Uncertainty in N2O Emissions from U.S. Cropland Soils." Global Biogeochemical Cycles, 24, GB1009, doi:10.1029/2009GB003544.

Deren, C. (2002) Personal Communication and Dr. Chris Deren, Everglades Research and Education Centre at the University of Florida and Caren Mintz, ICF International. August 15, 2002.

Fitzgerald, G.J., K. M. Scow & J. E. Hill (2000) "Fallow Season Straw and Rice Management Effects on Methane Emissions in California Rice." Global biogeochemical cycles, 14 (3), 767-776.

Fleskes, J.P., Perry, W.M., Petrik, K.L., Spell, R., and Reid, F. (2005) Change in area of winter-flood and dry rice in the northern Central Valley of California determined by satellite imagery. California Fish and Game, 91: 207-215.

Gonzalez, R. (2007 through 2014) Email correspondence. Rene Gonzalez, Plant Manager, Sem-Chi Rice Company and ICF International.

Hardke, J.T. (2015) Trends in Arkansas rice production, 2014. B.R. Wells Arkansas Rice Research Studies 2014. Norman, R.J. and Moldenhauer, K.A.K. (Eds.). Research Series 626, Arkansas Agricultural Experiment Station, University of Arkansas.

Hardke, J. (2014) Personal Communication. Dr. Jarrod Hardke, Rice Extension Agronomist at the University of Arkansas Rice Research and Extension Center and Kirsten Jaglo, ICF International. September 11, 2014.

Hardke, J. (2013) Email correspondence. Dr. Jarrod Hardke, Rice Extension Agronomist at the University of Arkansas Rice Research and Extension Center and Cassandra Snow, ICF International. July 15, 2013.

Hardke, J.T., and Wilson, C.E. Jr., (2014) Trends in Arkansas rice production, 2013. B.R. Wells Arkansas Rice Research Studies 2013. Norman, R.J., and Moldenhauer, K.A.K., (Eds.). Research Series 617, Arkansas Agricultural Experiment Station, University of Arkansas.

Hardke, J.T., and Wilson, C.E. Jr., (2013) Trends in Arkansas rice production. B.R. Wells Arkansas Rice Research Studies 2012. Norman, R.J., and Moldenhauer, K.A.K., (Eds.). Research Series 609, Arkansas Agricultural Experiment Station, University of Arkansas.

Hollier, C. A. (ed), (1999) Louisiana rice production handbook. Louisiana State University Agricultural Center. LCES Publication Number 2321. 116 pp.

Holzapfel-Pschorn, A., R. Conrad, and W. Seiler (1985) "Production, Oxidation, and Emissions of Methane in Rice Paddies." FEMS Microbiology Ecology, 31:343-351.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

Kirstein, A. (2003 through 2004, 2006) Personal Communication. Arthur Kirstein, Coordinator, Agricultural Economic Development Program, Palm Beach County Cooperative Extension Service, FL and ICF International. Klosterboer, A. (1997, 1999 through 2003) Personal Communication. Arlen Klosterboer, retired Extension Agronomist, Texas A&M University and ICF International. July 7, 2003.

Lindau, C.W. and P.K. Bollich (1993) "Methane Emissions from Louisiana First and Ratoon Crop Rice." Soil Science, 156:42-48.

Linquist, B.A., M.A. Adviento-Borbe, C.M. Pittelkow, C.v. Kessel, et al. (2012) Fertilizer management practices and greenhouse gas emissions from rice systems: A quantitative review and analysis. *Field Crops Research*, 135:10-21.

Linscombe, S. (1999, 2001 through 2014) Email correspondence. Steve Linscombe, Professor with the Rice Research Station at Louisiana State University Agriculture Center and ICF International.

LSU, (2015) Louisiana ratoon crop and conservation: Ratoon & Conservation Tillage Estimates. Louisiana State University, College of Agriculture AgCenter. Online at: www.lsuagcenter.com.

Miller, M.R., Garr, J.D., and Coates, P.S., (2010) Changes in the status of harvested rice fields in the Sacramento Valley, California: Implications for wintering waterfowl. Wetlands, 30: 939-947.

Neue, H.U., R. Wassmann, H.K. Kludze, W. Bujun, and R.S. Lantin (1997) "Factors and processes controlling methane emissions from rice fields." *Nutrient Cycling in Agroecosystems* 49: 111-117.

Ogle, S.M., F.J. Breidt, M. Easter, S. Williams and K. Paustian. (2007) "An empirically based approach for estimating uncertainty associated with modeling carbon sequestration in soils." *Ecological Modelling* 205:453-463.

Ogle, S.M., S. Spencer, M. Hartman, L. Buendia, L. Stevens, D. du Toit, J. Witi (2016) "Developing national baseline GHG emissions and analyzing mitigation potentials for agriculture and forestry using an advanced national GHG inventory software system." In Advances in Agricultural Systems Modeling 6, Synthesis and Modeling of Greenhouse Gas Emissions and Carbon Storage in Agricultural and Forestry Systems to Guide Mitigation and Adaptation, S. Del Grosso, L.R. Ahuja and W.J. Parton (eds.), American Society of Agriculture, Crop Society of America and Soil Science Society of America, pp. 129-148.

Parton, W.J., M.D. Hartman, D.S. Ojima, and D.S. Schimel (1998) "DAYCENT: Its Land Surface Submodel: Description and Testing". Glob. Planet. Chang. 19: 35-48.

Parton, W.J., D.S. Schimel, C.V. Cole, D.S. Ojima (1987) "Analysis of factors controlling soil organic matter levels in Great Plains grasslands." Soil Science Society of America Journal 51:1173-1179.

Sass, R. L. (2001) CH₄ Emissions from Rice Agriculture. Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. 399-417. Available online at: http://www.ipcc-nggip.iges.or.jp/public/gp/bgp/4 7 CH4 Rice Agriculture.pdf.

Sass, R.L., F.M. Fisher, P.A. Harcombe, and F.T. Turner (1990) "Methane Production and Emissions in a Texas Rice Field." *Global Biogeochemical Cycles*, 4:47-68.

Sass, R.L., F.M. Fisher, S.T. Lewis, M.F. Jund, and F.T. Turner. (1994) "Methane emissions from rice fields: effect of soil texture." *Global Biogeochemical Cycles* 8:135-140.

Schueneman, T. (1997, 1999 through 2001) Personal Communication. Tom Schueneman, Agricultural Extension Agent, Palm Beach County, FL and ICF International.

Slaton, N. (1999 through 2001) Personal Communication. Nathan Slaton, Extension Agronomist—Rice, University of Arkansas Division of Agriculture Cooperative Extension Service and ICF International.

Stansel, J. (2004 through 2005) Email correspondence. Dr. Jim Stansel, Resident Director and Professor Emeritus, Texas A&M University Agricultural Research and Extension Center and ICF International.

TAMU (2015) Texas Rice Crop Survey. Texas A&M AgriLIFE Research Center at Beaumont. Online at: https://beaumont.tamu.edu/.

Texas Agricultural Experiment Station (2007 through 2014) Texas Rice Acreage by Variety. Agricultural Research and Extension Center, Texas Agricultural Experiment Station, Texas A&M University System. Available online at: http://beaumont.tamu.edu/CropSurvey/CropSurveyReport.aspx.

Texas Agricultural Experiment Station (2006) 2005 - Texas Rice Crop Statistics Report. Agricultural Research and Extension Center, Texas Agricultural Experiment Station, Texas A&M University System, p. 8. Available online at: http://beaumont.tamu.edu/eLibrary/TRRFReport_default.htm.

University of California Cooperative Extension (UCCE) (2015) Rice Production Manual. Revised (2015) UCCE, Davis, in collaboration with the California Rice Research Board.

USDA (2005 through 2015) Crop Production Summary. National Agricultural Statistics Service, Agricultural Statistics Board, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu.

USDA (2012) Summary of USDA-ARS Research on the Interrelationship of Genetic and Cultural Management Factors That Impact Grain Arsenic Accumulation in Rice. News and Events. Agricultural Research Service, U.S. Department of Agriculture, Washington, D.C. Available online at: http://www.ars.usda.gov/is/pr/2012/120919.htm. September 2013.

USDA (2003) Field Crops, Final Estimates 1997-2002. Statistical Bulletin No. 982. National Agricultural Statistics Service, Agricultural Statistics Board, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu/usda/reports/general/sb/. September 2005.

USDA (1998) Field Crops Final Estimates 1992-1997. Statistical Bulletin Number 947 a. National Agricultural Statistics Service, Agricultural Statistics Board, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu/. July 2001.

USDA (1994) Field Crops Final Estimates 1987-1992. Statistical Bulletin Number 896. National Agricultural Statistics Service, Agricultural Statistics Board, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu/. July 2001.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory. Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

van Bodegom, P.M., R. Wassmann, T.M. Metra-Corton (2001) "A process based model for methane emission predictions from flooded rice paddies." Global Biogeochemical Cycles 15: 247-263.

Wang, J.J., S.K. Dodla, S. Viator, M. Kongchum, S. Harrison, S. D. Mudi, S. Liu, Z. Tian (2013) Agriculture Field Management Practices and Greenhouse Gas Emissions from Louisiana Soils. Louisiana Agriculture, Spring 2013: 8-9. Available online at: http://www.lsuagcenter.com/NR/rdonlyres/78D8B61A-96A8-49E1-B2EF-BA1D4CE4E698/93016/v56no2Spring2013.pdf.

Wassmann, R. H.U. Neue, R.S. Lantin, K. Makarim, N. Chareonsil5, L.V. Buendia, and H. Rennenberg (2000a) Characterization of methane emissions from rice fields in Asia II. Differences among irrigated, rainfed, and deepwater rice." Nutrient Cycling in Agroecosystems, 58(1):13-22.

Wassmann, R., R.S. Lantin, H.U. Neue, L.V. Buendia, et al. (2000b) "Characterization of Methane Emissions from Rice Fields in Asia. III. Mitigation Options and Future Research Needs." Nutrient Cycling in Agroecosystems, 58(1):23-36.

Way, M.O., McCauley, G.M., Zhou, X.G., Wilson, L.T., and Morace, B. (Eds.), (2014) 2014 Texas Rice Production Guidelines. Texas A&M AgriLIFE Research Center at Beaumont.

Wilson, C. (2002 through 2007, 2009 through 2012) Personal Communication. Dr. Chuck Wilson, Rice Specialist at the University of Arkansas Cooperative Extension Service and ICF International.

Wilson, C.E. Jr., and Branson, J.W., (2006) Trends in Arkansas rice production. B.R. Wells Arkansas Rice Research Studies 2005. Norman, R.J., Meullenet, J.-F., and Moldenhauer, K.A.K., (Eds.). Research Series 540, Arkansas Agricultural Experiment Station, University of Arkansas.

Wilson, C.E. Jr., and Branson, J.W., (2005) Trends in Arkansas rice production. B.R. Wells Arkansas Rice Research Studies 2004. Norman, R.J., Meullenet, J.-F., and Moldenhauer, K.A.K., (Eds.). Research Series 529, Arkansas Agricultural Experiment Station, University of Arkansas.

Wilson, C.E. Jr., Runsick, S.K., and Mazzanti, R., (2010) Trends in Arkansas rice production. B.R. Wells Arkansas Rice Research Studies 2009. Norman, R.J., and Moldenhauer, K.A.K., (Eds.). Research Series 581, Arkansas Agricultural Experiment Station, University of Arkansas.

Wilson, C.E. Jr., Runsick, S.K., Mazzanti, R., (2009) Trends in Arkansas rice production. B.R. Wells Arkansas Rice Research Studies (2008) Norman, R.J., Meullenet, J.-F., and Moldenhauer, K.A.K., (Eds.). Research Series 571, Arkansas Agricultural Experiment Station, University of Arkansas.

Wilson, C.E. Jr., and Runsick, S.K., (2008) Trends in Arkansas rice production. B.R. Wells Arkansas Rice Research Studies 2007. Norman, R.J., Meullenet, J.-F., and Moldenhauer, K.A.K., (Eds.). Research Series 560, Arkansas Agricultural Experiment Station, University of Arkansas.

Wilson, C.E. Jr., and Runsick, S.K., (2007) Trends in Arkansas rice production. B.R. Wells Arkansas Rice Research Studies 2006. Norman, R.J., Meullenet, J.-F., and Moldenhauer, K.A.K., (Eds.). Research Series 550, Arkansas Agricultural Experiment Station, University of Arkansas.

Yan, X., H. Akiyana, K. Yagi, and H. Akimoto (2009) "Global estimations of the inventory and mitigation potential of methane emissions from rice cultivation conducted using the 2006 Intergovernmental Panel on Climate Change Guidelines." *Global Biogeochemical Cycles*, 23, DOI: 0.1029/2008GB003299.

Young, M. (2013) Rice and Ducks. Ducks Unlimited, Memphis, TN. Available online at: http://www.ducks.org/conservation/farm-bill/rice-and-ducks---by-matt-young.

Agricultural Soil Management

AAPFCO (2008 through 2022) Commercial Fertilizers: 2008-2017. Association of American Plant Food Control Officials. University of Missouri. Columbia, MO.

AAPFCO (1995 through 2000a, 2002 through 2007) Commercial Fertilizers: 1995-2007. Association of American Plant Food Control Officials. University of Kentucky. Lexington, KY.

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Cibrowski, P. (1996) Personal Communication. Peter Cibrowski, Minnesota Pollution Control Agency and Heike Mainhardt, ICF Incorporated. July 29, 1996.

Cheng, B., and D.M. Titterington (1994) "Neural networks: A review from a statistical perspective." Statistical science 9: 2-30.

Claassen, R., M. Bowman, J. McFadden, D. Smith, and S. Wallander (2018) Tillage intensity and conservation cropping in the United States, EIB 197. United States Department of Agriculture, Economic Research Service, Washington, D.C.

CTIC (2004) 2004 Crop Residue Management Survey. Conservation Technology Information Center. Available at http://www.ctic.purdue.edu/CRM/.

Del Grosso, S.J., T. Wirth, S.M. Ogle, W.J. Parton (2008) Estimating agricultural nitrous oxide emissions. EOS 89, 529-530.

Del Grosso, S.J., A.R. Mosier, W.J. Parton, and D.S. Ojima (2005) "DAYCENT Model Analysis of Past and Contemporary Soil N₂O and Net Greenhouse Gas Flux for Major Crops in the USA." Soil Tillage and Research, 83: 9-24. doi: 10.1016/j.still.2005.02.007.

Del Grosso, S.J., W.J. Parton, A.R. Mosier, M.D. Hartman, J. Brenner, D.S. Ojima, and D.S. Schimel (2001) "Simulated Interaction of Carbon Dynamics and Nitrogen Trace Gas Fluxes Using the DAYCENT Model." In Schaffer, M., L. Ma, S. Hansen, (eds.). Modeling Carbon and Nitrogen Dynamics for Soil Management. CRC Press. Boca Raton, Florida. 303-332.

Del Grosso, S.J., S.M. Ogle, W.J. Parton, and F.J. Breidt (2010) "Estimating Uncertainty in N2O Emissions from U.S. Cropland Soils." Global Biogeochemical Cycles, 24, GB1009, doi:10.1029/2009GB003544.

Del Grosso, S.J., W.J. Parton, C.A. Keough, and M. Reyes-Fox. (2011) Special features of the DAYCENT modeling package and additional procedures for parameterization, calibration, validation, and applications, in Methods of Introducing System Models into Agricultural Research, L.R. Ahuja and Liwang Ma, editors, p. 155-176, American Society of Agronomy, Crop Science Society of America, Soil Science Society of America, Madison, WI. USA.

Del Grosso, S. J., S. M. Ogle, C. Nevison, R. Gurung, W. J. Parton, C. Wagner-Riddle, W. Smith, W. Winiwarter, B. Grant, M. Tenuta, E. Marx, S. Spencer, and S. Williams. 2022. A gap in nitrous oxide emission reporting complicates long-term climate mitigation. Proceedings of the National Academy of Sciences 119:e2200354119.

Delgado, J.A., S.J. Del Grosso, and S.M. Ogle (2009) "15N isotopic crop residue cycling studies and modeling suggest that IPCC methodologies to assess residue contributions to N2O-N emissions should be reevaluated." Nutrient *Cycling in Agroecosystems*, DOI 10.1007/s10705-009-9300-9.

Edmonds, L., N. Gollehon, R.L. Kellogg, B. Kintzer, L. Knight, C. Lander, J. Lemunyon, D. Meyer, D.C. Moffitt, and J. Schaeffer (2003) "Costs Associated with Development and Implementation of Comprehensive Nutrient Management Plans." Part 1. Nutrient Management, Land Treatment, Manure and Wastewater Handling and Storage, and Recordkeeping. Natural Resource Conservation Service, U.S. Department of Agriculture.

EPA (2003) Clean Watersheds Needs Survey 2000—Report to Congress, U.S. Environmental Protection Agency. Washington, D.C. Available online at: http://www.epa.gov/owm/mtb/cwns/2000rtc/toc.htm.

EPA (1999) Biosolids Generation, Use and Disposal in the United States. Office of Solid Waste, U.S. Environmental Protection Agency. Available online at: http://biosolids.policy.net/relatives/18941.PDF.

EPA (1993) Federal Register. Part II. Standards for the Use and Disposal of Sewage Sludge; Final Rules. U.S. Environmental Protection Agency, 40 CFR Parts 257, 403, and 503.

Firestone, M. K., and E.A. Davidson, Ed. (1989) Microbiological basis of NO and N₂O production and consumption in soil. Exchange of trace gases between terrestrial ecosystems and the atmosphere. New York, John Wiley & Sons.

Friedman, J.H. (2001) "Greedy function approximation: A gradient boosting machine." Ann. Statist. 29 (5) 1189 -1232.

Hagen, S. C., G. Delgado, P. Ingraham, I. Cooke, R. Emery, J. P. Fisk, L. Melendy, T. Olson, S. Patti, N. Rubin, B. Ziniti, H. Chen, W. Salas, P. Elias, and D. Gustafson. 2020. Mapping Conservation Management Practices and Outcomes in the Corn Belt Using the Operational Tillage Information System (OpTIS) and the Denitrification-Decomposition (DNDC) Model. Land 9:408.

ILENR (1993) Illinois Inventory of Greenhouse Gas Emissions and Sinks: 1990. Office of Research and Planning, Illinois Department of Energy and Natural Resources. Springfield, IL.

IPCC (2014) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. The Intergovernmental Panel on Climate Change. [T, Hiraishi, T. Krug, K. Tanabe, N. Srivastava, B. Jamsranjav, M. Fukuda and T. Troxler (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Little, R. (1988) "Missing-data adjustments in large surveys." *Journal of Business and Economic Statistics* 6: 287–296.

McFarland, M.J. (2001) Biosolids Engineering, New York: McGraw-Hill, p. 2.12.

McGill, W.B., and C.V. Cole (1981) Comparative aspects of cycling of organic C, N, S and P through soil organic matter. *Geoderma* 26:267-286.

Metherell, A.K., L.A. Harding, C.V. Cole, and W.J. Parton (1993) "CENTURY Soil Organic Matter Model Environment." Agroecosystem version 4.0. Technical documentation, GPSR Tech. Report No. 4, USDA/ARS, Ft. Collins, CO.

NEBRA (2007) A National Biosolids Regulation, Quality, End Use & Disposal Survey. North East Biosolids and Residuals Association, July 21, 2007.

Noller, J. (1996) Personal Communication. John Noller, Missouri Department of Natural Resources and Heike Mainhardt, ICF Incorporated. July 30, 1996.

Ogle, S.M., F.J. Breidt, M. Easter, S. Williams and K. Paustian (2007) "Empirically-Based Uncertainty Associated with Modeling Carbon Sequestration Rates in Soils." *Ecological Modeling* 205:453-463.

Oregon Department of Energy (1995) Report on Reducing Oregon's Greenhouse Gas Emissions: Appendix D Inventory and Technical Discussion. Oregon Department of Energy. Salem, OR.

Parton, W.J., M.D. Hartman, D.S. Ojima, and D.S. Schimel (1998) "DAYCENT: Its Land Surface Submodel: Description and Testing." *Glob. Planet. Chang.* 19: 35-48.

Potter, C., S. Klooster, A. Huete, and V. Genovese (2007) Terrestrial carbon sinks for the United States predicted from MODIS satellite data and ecosystem modeling. *Earth Interactions* 11, Article No. 13, DOI 10.1175/EI228.1.

Potter, C. S., J.T. Randerson, C.B. Fields, P.A. Matson, P.M. Vitousek, H.A. Mooney, and S.A. Klooster (1993) "Terrestrial ecosystem production: a process model based on global satellite and surface data." *Global Biogeochemical Cycles* 7:811-841.

PRISM Climate Group (2022) PRISM Climate Data, Oregon State University, http://prism.oregonstate.edu, downloaded January 2022.

Pukelsheim, F. (1994) "The 3-Sigma-Rule." American Statistician 48:88-91.

Ruddy B.C., D.L. Lorenz, and D.K. Mueller (2006) County-level estimates of nutrient inputs to the land surface of the conterminous United States, 1982-2001. Scientific Investigations Report 2006-5012. U.S Department of the Interior.

Scheer, C., S.J. Del Grosso, W.J. Parton, D.W. Rowlings, P.R. Grace (2013) Modeling Nitrous Oxide Emissions from Irrigated Agriculture: Testing DAYCENT with High Frequency Measurements, Ecological Applications, in press. Available online at: http://dx.doi.org/10.1890/13-0570.1.

Soil Survey Staff (2020) Gridded Soil Survey Geographic (gSSURGO) Database for the Conterminous United States. United States Department of Agriculture, Natural Resources Conservation Service, Accessed February 2020 (FY2020 official release), Available online at https://gdg.sc.egov.usda.gov/.

Towery, D. (2001) Personal Communication. Dan Towery regarding adjustments to the CTIC (1998) tillage data to reflect long-term trends, Conservation Technology Information Center, West Lafayette, IN, and Marlen Eve, National Resource Ecology Laboratory, Fort Collins, CO. February 2001.

TVA (1991 through 1992a, 1993 through 1994) Commercial Fertilizers. Tennessee Valley Authority, Muscle Shoals,

USDA-ERS (2020) Agricultural Resource Management Survey (ARMS) Farm Financial and Crop Production Practices: Tailored Reports. Available online at: https://www.ers.usda.gov/data-products/arms-farm-financial-and-cropproduction-practices/.

USDA-ERS (1997) Cropping Practices Survey Data—1995. Economic Research Service, United States Department of Agriculture. Available online at: http://www.ers.usda.gov/data/archive/93018/.

USDA-NASS (2022) Quick Stats. National Agricultural Statistics Service, United States Department of Agriculture, Washington, D.C., Accessed October 2022, http://quickstats.nass.usda.gov/.

USDA-NASS (2021) Published crop data layer. Available at https://nassgeodata.gmu.edu/CropScape/, Accessed July 2021, USDA-NASS, Washington, DC.

USDA-NASS (2017) 2017 Census of Agriculture. USDA National Agricultural Statistics Service, Complete data available at http://www.nass.usda.gov/AgCensus.

USDA-NASS (2012) 2012 Census of Agriculture. USDA National Agricultural Statistics Service, Complete data available at http://www.nass.usda.gov/AgCensus.

USDA-NASS (2004) Agricultural Chemical Usage: 2003 Field Crops Summary. Report AgCh1(04)a. National Agricultural Statistics Service, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu/reports/nassr/other/pcu-bb/agcs0504.pdfH.

USDA-NASS (1999) Agricultural Chemical Usage: 1998 Field Crops Summary. Report AgCH1(99). National Agricultural Statistics Service, U.S. Department of Agriculture, Washington, DC. Available online at: http://usda.mannlib.cornell.edu/reports/nassr/other/pcu-bb/agch0599.pdf.

USDA-NASS (1992) Agricultural Chemical Usage: 1991 Field Crops Summary. Report AgCh1(92). National Agricultural Statistics Service, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu/reports/nassr/other/pcu-bb/agch0392.txtH.

USDA-NRCS (2012) Assessment of the Effects of Conservation Practices on Cultivated Cropland in the Upper Mississippi River Basin. U.S. Department of Agriculture, Natural Resources Conservation Service, https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/stelprdb1042093.pdf.

USDA-NRCS (2018) CEAP Cropland Farmer Surveys. USDA Natural Resources Conservation Service. https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/ceap/na/?cid=nrcs143 014163.

USDA-NRCS (2020) Summary Report: 2017 National Resources Inventory. Natural Resources Conservation Service, Washington, DC, and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/nra/nri/results/.

USDA-NRCS (2022) Conversation practice on cultivated croplands: A comparison of CEAP I and CEAP II survey data and modeling. United States Department of Agriculture, Natural Resources Conservation Service, https://www.nrcs.usda.gov/sites/default/files/2022-09/CEAP-Croplands-ConservationPracticesonCultivatedCroplands-Report-March2022.pdf.

USFS (2019) Forest Inventory and Analysis Program. United States Department of Agriculture, U.S. Forest Service, https://www.fia.fs.fed.us/tools-data/default.asp.

Van Buuren, S. (2012) "Flexible imputation of missing data." Chapman & Hall/CRC, Boca Raton, FL.

Wagner-Riddle, C., Congreves, K. A., Abalos, D., Berg, A. A., Brown, S. E., Ambadan, J. T., Gao, X. & Tenuta, M. (2017) "Globally important nitrous oxide emissions from croplands induced by freeze-thaw cycles." Nature Geosciences 10(4): 279-283.

Wisconsin Department of Natural Resources (1993) Wisconsin Greenhouse Gas Emissions: Estimates for 1990. Bureau of Air Management, Wisconsin Department of Natural Resources, Madison, WI.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) "A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies." *ISPRS Journal of Photogrammetry and Remote Sensing* 146: 108-123.

Liming

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Tepordei, V.V. (1994 through 2015) "Crushed Stone," In Minerals Yearbook. U.S. Department of the Interior/U.S. Geological Survey. Washington, D.C. Available online at: http://minerals.usgs.gov/minerals/.

Tepordei, V.V. (2003b) Personal communication. Valentin Tepordei, U.S. Geological Survey and ICF Consulting, August 18, 2003.

USGS (2022) Mineral Industry Surveys: Crushed Stone and Sand and Gravel in the First Quarter of 2022, U.S. Geological Survey, Reston, VA. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis.

USGS (2021) Mineral Industry Surveys: Crushed Stone and Sand and Gravel in the Fourth Quarter of 2021, U.S. Geological Survey, Reston, VA. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis.

USGS (2020) Mineral Industry Surveys: Crushed Stone and Sand and Gravel in the Fourth Quarter of 2020, U.S. Geological Survey, Reston, VA. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone_crushed/index.html#mis.

West, T.O., and A.C. McBride (2005) "The contribution of agricultural lime to carbon dioxide emissions in the United States: dissolution, transport, and net emissions," Agricultural Ecosystems & Environment 108:145-154.

West, T.O. (2008) Email correspondence. Tristram West, Environmental Sciences Division, Oak Ridge National Laboratory, U.S. Department of Energy and Nikhil Nadkarni, ICF International on suitability of liming emission factor for the entire United States. June 9, 2008.

Willett, J.C. (2022d) Personal communication. Jason Willett. Preliminary data tables from "Crushed Stone," In 2021 Minerals Yearbook. U.S. Department of the Interior/U.S. Geological Survey. Washington, D.C. October, 2022.

Willett, J.C. (2022c) "Crushed Stone," In Minerals Yearbook 2020. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at: https://www.usgs.gov/centers/national-minerals-information-center/crushed-stone-statistics-and-information. Accessed October 2022

Willett, J.C. (2022b) "Crushed Stone," In Minerals Yearbook 2019. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at: https://www.usgs.gov/centers/national-minerals-information-center/crushed-stone-statistics-and-information. Accessed October 2022

Willett, J.C. (2022a) "Crushed Stone," In Minerals Yearbook 2018. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at: https://www.usgs.gov/centers/national-minerals-information-center/crushed-stone-statistics-and-information. Accessed October 2022.

Willett, J.C. (2020a) "Crushed Stone," In Minerals Yearbook 2016. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed November 2020.

Willett, J.C. (2017) "Crushed Stone," In Minerals Yearbook 2015. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed November 2017.

Willett, J.C. (2016) "Crushed Stone," In Minerals Yearbook 2014. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone_crushed/index.html#mis. Accessed September 2016.

Willett, J.C. (2015) "Crushed Stone," In Minerals Yearbook 2013. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone_crushed/index.html#mis. Accessed September 2015.

Willett, J.C. (2014) "Crushed Stone," In Minerals Yearbook 2012. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed September 2014.

Willett, J.C. (2013b) Personal Communication. Jason Willet, U.S. Geological Survey and ICF International. September 9, 2013.

Willett, J.C. (2013a) "Crushed Stone," In Minerals Yearbook 2011. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed May 2013.

Willett, J.C. (2011a) "Crushed Stone," In Minerals Yearbook 2009. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed August 2011.

Willett, J.C. (2011b) "Crushed Stone," In Minerals Yearbook 2010. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed September 2012.

Willett, J.C. (2010) "Crushed Stone," In Minerals Yearbook 2008. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed August 2010.

Willett, J.C. (2009) "Crushed Stone," In Minerals Yearbook 2007. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed August 2009.

Willett, J.C. (2007a) "Crushed Stone," In Minerals Yearbook 2005. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed August 2007.

Willett, J.C. (2007b) "Crushed Stone," In Minerals Yearbook 2006. U.S. Department of the Interior/U.S. Geological Survey, Washington, D.C. Available online at:

http://minerals.usgs.gov/minerals/pubs/commodity/stone crushed/index.html#mis. Accessed August 2008.

Urea Fertilization

AAPFCO (2008 through 2022) Commercial Fertilizers. Association of American Plant Food Control Officials. University of Missouri. Columbia, MO.

AAPFCO (1995 through 2000a, 2002 through 2007) Commercial Fertilizers. Association of American Plant Food Control Officials. University of Kentucky. Lexington, KY.

AAPFCO (2000b) 1999-2000 Commercial Fertilizers Data, ASCII files. Available from David Terry, Secretary, AAPFCO.

EPA (2000) Preliminary Data Summary: Airport Deicing Operations (Revised). EPA-821-R-00-016. August 2000.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Itle, C. (2009) Email correspondence. Cortney Itle, ERG and Tom Wirth, U.S. Environmental Protection Agency on the amount of urea used in aircraft deicing. January 7, 2009.

TVA (1991 through 1994) Commercial Fertilizers. Tennessee Valley Authority, Muscle Shoals, AL.

TVA (1992b) Fertilizer Summary Data 1992. Tennessee Valley Authority, Muscle Shoals, AL.

Field Burning of Agricultural Residues

Akintoye, H.A., Agbeyi, E.O., and Olaniyan, A.B. (2005) "The effects of live mulches on tomato (Lycopersicon esculentum) yield under tropical conditions." *Journal of Sustainable Agriculture* 26: 27-37.

Bange, M.P., Milroy, S.P., and Thongbai, P. (2004) "Growth and yield of cotton in response to waterlogging." *Field Crops Research* 88: 129-142.

Beyaert, R.P. (1996) *The effect of cropping and tillage management on the dynamics of soil organic matter*. PhD Thesis. University of Guelph.

Bouquet, D.J., and Breitenbeck, G.A. (2000) "Nitrogen rate effect on partitioning of nitrogen and dry matter by cotton." *Crop Science* 40: 1685-1693.

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.Cantens, G. (2004 through 2005) Personal Communication. Janet Lewis, Assistant to Gaston Cantens, Vice President of Corporate Relations, Florida Crystals Company and ICF International.

Brouder, S.M., and Cassman, K.G (1990) "Root development of two cotton cultivars in relation to potassium uptake and plant growth in a vermiculitic soil." *Field Crops Res.* 23: 187-203.

Costa, L.D., and Gianquinto, G. (2002) "Water stress and watertable depth influence yield, water use efficiency, and nitrogen recovery in bell pepper: lysimeter studies." *Aust. J. Agric. Res.* 53: 201–210.

Crafts-Brandner, S.J., Collins, M., Sutton, T.G., and Burton, H.R. (1994) "Effect of leaf maleic hydrazide concentration on yield and dry matter partitioning in burley tobacco (Nicotiana tabacum L.)." Field Crops Research 37: 121-128.

De Pinheiro Henriques, A.R., and Marcelis, L.F.M. (2000) "Regulation of growth at steady-state nitrogen nutrition in lettuce (Lactuca sativa L.): Interactive effects of nitrogen and irradiance." *Annals of Botany* 86: 1073-1080.0.

Díaz-Pérez, J.C., Silvoy, J., Phatak, S.C., Ruberson, J., and Morse, R. (2008) Effect of winter cover crops and co-till on the yield of organically-grown bell pepper (Capsicum annum L.). *Acta Hort*. 767:243-247.

Dua, K.L., and Sharma, V.K. (1976) "Dry matter production and energy contents of ten varieties of sugarcane at Muzaffarnagar (Western Uttar Pradesh)." *Tropical Ecology* 17: 45-49.

Fritschi, F.B., Roberts, B.A., Travis, R.L., Rains, D.W., and Hutmacher, R.B. (2003) "Seasonal nitrogen concentration, uptake, and partitioning pattern of irrigated Acala and Pima cotton as influenced by nitrogen fertility level." *Crop Science* 44:516–527.

Gerik, T.J., K.L. Faver, P.M. Thaxton, and K.M. El-Zik. (1996) "Late season water stress in cotton: I. Plant growth, water use, and yield." *Crop Science* 36: 914–921.

Gibberd, M.R., McKay, A.G., Calder, T.C., and Turner, N.C. (2003) "Limitations to carrot (Daucus carota L.) productivity when grown with reduced rates of frequent irrigation on a free-draining, sandy soil." *Australian Journal of Agricultural Research* 54: 499-506.

Giglio, L., I. Csiszar, and C.O. Justice (2006) "Global distribution and seasonality of active fires as observed with the Terra and Aqua Moderate Resolution Imaging Spectroradiometer (MODIS) sensors" J. Geophys. Res. 111, G02016, doi:10.1029/2005JG000142.

Halevy, J. (1976) "Growth rate and nutrient uptake of two cotton cultivars grown under irrigation." Agronomy Journal 68: 701-705.

Halvorson, A.D., Follett, R.F., Bartolo, M.E., and Schweissing, F.C. (2002) "Nitrogen fertilizer use efficiency of furrow-irrigated onion and corn." Agronomy Journal 94: 442-449.

Heitholt, J.J., Pettigrew, W.T., and Meredith, W.R. (1992) "Light interception and lint yield of narrow-row cotton." Crop Science 32: 728-733.

Hollifield, C.D., Silvertooth, J.C., and Moser, H. (2000) "Comparison of obsolete and modern cotton cultivars for irrigated production in Arizona." 2000 Arizona Cotton Report, University of Arizona College of Agriculture, http://ag.arizona.edu/pubs/crops/az1170/.

Hopkinson, J.M. (1967) "Effects of night temperature on the growth of Nicotiana tabacum." Australian Journal of Experimental Agriculture and Animal Husbandry 7: 78–82.

Huett, D.O., and Dettman, E.B. (1991) Effect of nitrogen on growth, quality and nutrient uptake of cabbages grown in sand culture. Australian Journal of Experimental Agriculture 29: 875-81.

Huett, D.O., and Dettman, B. (1989) "Nitrogen response surface models of zucchini squash, head lettuce and potato." Plant and Soil 134: 243-254.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC/UNEP/OECD/IEA (1997) Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories. Intergovernmental Panel on Climate Change, United Nations Environment Programme, Organization for Economic Co-Operation and Development, International Energy Agency, Paris, France.

Jacobs, J.L., Ward, G.N., and Kearney, G. (2004) "Effects of irrigation strategies and nitrogen fertilizer on turnip dry matter yield, water use efficiency, nutritive characteristics and mineral content in western Victoria." Australian Journal of Experimental Agriculture 44: 13-26.

Jacobs, J.L., Ward, G.N., McDowell, A.M., and Kearney, G. (2002) "Effect of seedbed cultivation techniques, variety, soil type and sowing time, on brassica dry matter yields, water use efficiency and crop nutritive characteristics in western Victoria." Australian Journal of Experimental Agriculture 42: 945-952.

Jacobs, J.L., Ward, G.N., McDowell, A.M., and Kearney, G.A. (2001) "A survey on the effect of establishment techniques, crop management, moisture availability and soil type on turnip dry matter yields and nutritive characteristics in western Victoria." Australian Journal of Experimental Agriculture 41: 743–751.

Kage, H., Alt, C., and Stűtzel, H. (2003) "Aspects of nitrogen use efficiency of cauliflower II. Productivity and nitrogen partitioning as influenced by N supply." Journal of Agricultural Science 141: 17–29.

Kumar, A., Singh, D.P., and Singh, P. (1994) "Influence of water stress on photosynthesis, transpiration, water-use efficiency and yield of Brassica juncea L." Field Crops Research 37: 95-101.

LANDFIRE (2008) Existing Vegetation Type Layer, LANDFIRE 1.1.0, U.S. Department of the Interior, Geological Survey. Accessed 28 October 2010 at http://landfire.cr.usgs.gov/viewer/.

MacLeod, L.B., Gupta, U.C., and Cutcliffe, J.A. (1971) "Effect of N, P, and K on root yield and nutrient levels in the leaves and roots of rutabagas grown in a greenhouse." Plant and Soil 35: 281-288.

Mahrani, A., and Aharonov, B. (1964) "Rate of nitrogen absorption and dry matter production by upland cotton grown under irrigation." Israel J. Agric. Res. 14: 3-9.

Marcussi, F.F.N., Bôas, R.L.V., de Godoy, L.J.G., and Goto, R. (2004) "Macronutrient accumulation and partitioning in fertigated sweet pepper plants." *Sci. Agric. (Piracicaba, Braz.)* 61: 62-68.

McCarty, J.L. (2011) "Remote Sensing-Based Estimates of Annual and Seasonal Emissions from Crop Residue Burning in the Contiguous United States." *Journal of the Air & Waste Management Association*, 61:1, 22-34, DOI: 10.3155/1047-3289.61.1.22.

McCarty, J.L. (2010) Agricultural Residue Burning in the Contiguous United States by Crop Type and State. Geographic Information Systems (GIS) Data provided to the EPA Climate Change Division by George Pouliot, Atmospheric Modeling and Analysis Division, EPA. Dr. McCarty's research was supported by the NRI Air Quality Program of the Cooperative State Research, Education, and Extension Service, USDA, under Agreement No. 20063511216669 and the NASA Earth System Science Fellowship.

McCarty, J.L. (2009) Seasonal and Interannual Variability of Emissions from Crop Residue Burning in the Contiguous United States. Dissertation. University of Maryland, College Park.

McPharlin, I.R., Aylmore, P.M., and Jeffery, R.C. (1992) "Response of carrots (Daucus carota L.) to applied phosphorus and phosphorus leaching on a Karrakatta sand, under two irrigation regimes." *Australian Journal of Experimental Agriculture* 32:225-232.

Mondino, M.H., Peterlin, O.A., and Garay, F. (2004) "Response of late-planted cotton to the application of growth regulator (chlorocholine chloride, CYCOCEL 75)." *Expl Agric*. 40: 381–387.

Moustakas, N.K., and Ntzanis, H. (2005) "Dry matter accumulation and nutrient uptake in flue-cured tobacco (Nicotiana tabacum L.)." *Field Crops Research* 94: 1-13.

Peach, L., Benjamin, L.R., and Mead, A. (2000) "Effects on the growth of carrots (Daucus carota L.), cabbage (Brassica oleracea var. capitata L.) and onion (Allium cepa L.) of restricting the ability of the plants to intercept resources." *Journal of Experimental Botany* 51: 605-615.

Pettigrew, W.T., and Meredith, W.R., Jr. (1997) "Dry matter production, nutrient uptake, and growth of cotton as affected by potassium fertilization." *J. Plant Nutr.* 20:531–548.

Pettigrew, W.T., Meredith, W.R., Jr., and Young, L.D. (2005) "Potassium fertilization effects on cotton lint yield, yield components, and reniform nematode populations." *Agronomy Journal* 97: 1245-1251.

PRISM Climate Group (2015) PRISM Climate Data. Oregon State University. July 24, 2015. Available online at: http://prism.oregonstate.edu.

Reid, J.B., and English, J.M. (2000) "Potential yield in carrots (Daucus carota L.): Theory, test, and an application." *Annals of Botany* 85: 593-605.

Sadras, V.O., and Wilson, L.J. (1997) "Growth analysis of cotton crops infested with spider mites: II. Partitioning of dry matter." *Crop Science* 37: 492-497.

Scholberg, J., McNeal, B.L., Jones, J.W., Boote, K.J., Stanley, C.D., and Obreza, T.A. (2000a) "Growth and canopy characteristics of field-grown tomato." *Agronomy Journal* 92: 152-159.

Scholberg, J., McNeal, B.L., Boote, K.J., Jones, J.W., Locasio, S.J., and Olson, S.M. (2000b) "Nitrogen stress effects on growth and nitrogen accumulation by field-grown tomato." *Agronomy Journal* 92:159-167.

Singels, A. and Bezuidenhout, C.N. (2002) "A new method of simulating dry matter partitioning in the Canegro sugarcane model." *Field Crops Research* 78: 151 - 164.

Sitompul, S.M., Hairiah, K., Cadisch, G., and Van Noordwuk, M. (2000) "Dynamics of density fractions of macroorganic matter after forest conversion to sugarcane and woodlots, accounted for in a modified Century model." *Netherlands Journal of Agricultural Science* 48: 61-73.

Stirling, G.R., Blair, B.L., Whittle, P.J.L., and Garside, A.L. (1999) "Lesion nematode (Pratylenchus zeae) is a component of the yield decline complex of sugarcane." In: Magarey, R.C. (Ed.), Proceedings of the First Australasian Soilborne Disease Symposium. Bureau of Sugar Experiment Stations, Brisbane, pp. 15–16.

Tan, D.K.Y., Wearing, A.H., Rickert, K.G., and Birch, C.J. (1999) "Broccoli yield and quality can be determined by cultivar and temperature but not photoperiod in south-east Queensland." Australian Journal of Experimental Agriculture 39: 901-909.

Tadesse, T., Nichols, M.A., and Fisher, K.J. (1999) Nutrient conductivity effects on sweet pepper plants grown using a nutrient film technique. 1. Yield and fruit quality. New Zealand Journal of Crop and Horticultural Science, 27: 229-

Torbert, H.A., and Reeves, D.W. (1994) "Fertilizer nitrogen requirements for cotton production as affected by tillage and traffic." Soil Sci. Soc. Am. J. 58:1416-1423.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory, Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

USDA (2019) Quick Stats: U.S. & All States Data; Crops; Production and Area Harvested; 1990 - 2018. National Agricultural Statistics Service, U.S. Department of Agriculture. Washington, D.C. U.S. Department of Agriculture, National Agricultural Statistics Service. Washington, D.C., Available online at: http://quickstats.nass.usda.gov/.

Valantin, M., Gary, C., Vaissiére, B.E., and Frossard, J.S. (1999) "Effect of fruit load on partitioning of dry matter and energy in cantaloupe (Cucumis melo L.)." Annals of Botany 84: 173-181.

Wallach, D., Marani, A., and Kletter, E. (1978) "The relation of cotton crop growth and development to final yield." Field Crops Research 1: 283-294.

Wells, R., and Meredith, W.R., Jr. (1984) "Comparative growth of obsolete and modern cultivars. I. Vegetative dry matter partitioning." Crop Science 24: 858-872.4.

Wiedenfels, R.P. (2000) "Effects of irrigation and N fertilizer application on sugarcane yield and quality." Field Crops Research 43: 101-108.

Land Use, Land-Use Change, and Forestry

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

UNFCCC (2014) Report of the Conference of the Parties on its nineteenth session, held in Warsaw from 11 to 23 November 2013. United Nations Framework Convention on Climate Change, Warsaw. (FCCC/CP/2013/10/Add.3). January 31, 2014. Available online at: http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

Representation of the U.S. Land Base

Alaska Department of Natural Resources (2006) Alaska Infrastructure 1:63,360. Available online at: http://dnr.alaska.gov/SpatialUtility/SUC?cmd=extract&layerid=75.

Alaska Interagency Fire Management Council (1998) Alaska Interagency Wildland Fire Management Plan. Available online at: http://agdc.usgs.gov/data/blm/fire/index.html.

Alaska Oil and Gas Conservation Commission (2009) Oil and Gas Information System. Available online at: http://doa.alaska.gov/ogc/publicdb.html.

EIA (2011) Coal Production and Preparation Report Shapefile. Available online at: http://www.eia.gov/state/notessources.cfm#maps.

ESRI (2008) ESRI Data & Maps. Redlands, CA: Environmental Systems Research Institute. [CD-ROM].

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and J. Wickham. (2011) Completion of the 2006 National Land Cover Database for the Conterminous United States, PE&RS, Vol. 77(9):858-864.

Homer, C., J. Dewitz, J. Fry, M. Coan, N. Hossain, C. Larson, N. Herold, A. McKerrow, J.N. VanDriel and J. Wickham. (2007) Completion of the 2001 National Land Cover Database for the Conterminous United States, Photogrammetric Engineering and Remote Sensing, Vol. 73, No. 4, pp 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information. Photogrammetric Engineering and Remote Sensing, v. 81, no. 5, p. 345-354.

IPCC (2014) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds.). Published: IPCC, Switzerland.

IPCC (2010) Revisiting the use of managed land as a proxy for estimating national anthropogenic emissions and removals. [Eggleston HS, Srivastava N, Tanabe K, Baasansuren J, (eds.)]. Institute for Global Environmental Studies, Intergovernmental Panel on Climate Change, Hayama, Kanagawa, Japan.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Jin, S., L. Yang, P. Danielson, C. Homer, J. Fry, and G. Xian. (2013) A comprehensive change detection method for updating the National Land Cover Database to circa 2011. Remote Sensing of Environment, 132: 159-175.

Nelson, M.D., Riitters, K.H., Coulston, J.W., Domke, G.M., Greenfield, E.J., Langner, L.L., Nowak, D.J., O'Dea, C.B., Oswalt, S.N., Reeves, M.C. and Wear, D.N. (2020) Defining the United States land base: a technical document supporting the USDA Forest Service 2020 RPA assessment. Gen. Tech. Rep. NRS-191., 191, pp.1-70.

NOAA Coastal Change Analysis Program (C-CAP) Regional Land Cover Database. Data collected 1995-present Charleston, SC: National Oceanic and Atmospheric Administration (NOAA) Coastal Services Center. Data accessed at: www.csc.noaa.gov/landcover.

Nusser, S.M. and J.J. Goebel (1997) "The national resources inventory: a long-term multi-resource monitoring programme." Environmental and Ecological Statistics 4:181-204.

Ogle, S.M., G. Domke, W.A. Zurz, M.T. Rocha, T. Huffman, A. Swan, J.E. Smith, C. Woodall, T. Krug (2018) Delineating managed land for reporting greenhouse gas emissions and removals to the United Nations Framework Convention on Climate Change. Carbon Balance and Management 13:9.

- .U.S. Census Bureau (2010) Topologically Integrated Geographic Encoding and Referencing (TIGER) system shapefiles. U.S. Census Bureau, Washington, D.C. Available online at: http://www.census.gov/geo/www/tiger.
- U.S. Department of Agriculture (2015) County Data Livestock, 1990-2014. U.S. Department of Agriculture, National Agriculture Statistics Service, Washington, D.C.
- U.S. Department of Agriculture, Forest Service. (2012) Timber Product Output (TPO) Reports. Knoxville, TN: U.S. Department of Agriculture Forest Service, Southern Research Station.
- U.S. Department of Interior (2005) Federal Lands of the United States. National Atlas of the United States, U.S. Department of the Interior, Washington D.C. Available online at: http://nationalatlas.gov/atlasftp.html?openChapters=chpbound#chpbound.

USGS (2012) Alaska Resource Data File. Available online at: http://ardf.wr.usgs.gov/.

USGS (2005) Active Mines and Mineral Processing Plants in the United States in 2003. U.S. Geological Survey, Reston, VA.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies. ISPRS Journal of Photogrammetry and Remote Sensing 146: 108-123.

Forest Land Remaining Forest Land: Changes in Forest Carbon **Stocks**

AF&PA (2006a and earlier) Statistical roundup. (Monthly). Washington, D.C. American Forest & Paper Association.

AF&PA (2006b and earlier) Statistics of paper, paperboard and wood pulp. Washington, D.C. American Forest & Paper Association.

AF&PA (2021) 2020 Statistics – Paper Industry – Annual Summary Data Through 2020. Washington, D.C.: American Forest and Paper Association, 54 p.

Amichev, B.Y. and J.M. Galbraith (2004) "A Revised Methodology for Estimation of Forest Soil Carbon from Spatial Soils and Forest Inventory Data Sets." Environmental Management 33(Suppl. 1):S74-S86.

Bechtold, W.A.; Patterson, P.L. (2005) The enhanced forest inventory and analysis program—national sampling design and estimation procedures. Gen. Tech. Rep. SRS-80. Asheville, NC: U.S. Department of Agriculture Forest Service, Southern Research Station. 85 p.

Birdsey, R. (1996) "Carbon Storage for Major Forest Types and Regions in the Conterminous United States." In R.N. Sampson and D. Hair, (eds.). Forest and Global Change, Volume 2: Forest Management Opportunities for Mitigating Carbon Emissions. American Forests. Washington, D.C., 1-26 and 261-379 (appendices 262 and 263).

Coulston, J.W., Wear, D.N., and Vose, J.M. (2015) Complex forest dynamics indicate potential for slowing carbon accumulation in the southeastern United States. Scientific Reports. 5: 8002.

Domke, G.M., J.E. Smith, and C.W. Woodall. (2011) Accounting for density reduction and structural loss in standing dead trees: Implications for forest biomass and carbon stock estimates in the United States. Carbon Balance and Management. 6:14.

Domke, G.M., Woodall, C.W., Smith, J.E., Westfall, J.A., McRoberts, R.E. (2012) Consequences of alternative treelevel biomass estimation procedures on U.S. forest carbon stock estimates. Forest Ecology and Management. 270: 108-116.

Domke, G.M., Woodall, C.W., Walters, B.F., Smith, J.E. (2013) From models to measurements: comparing down dead wood carbon stock estimates in the U.S. forest inventory. PLoS ONE 8(3): e59949.

Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., and Smith, J.E. (2016) A framework for estimating litter carbon stocks in forests of the United States. Science of the Total Environment 557-558: 469-478.

Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., Nave, L., Swanston, C. (2017) Toward inventory-based estimates of soil organic carbon in forests of the United States. Ecological Applications. 27(4), 1223-1235.

Domke, G.M., Walters, B.F., Smith, J.E., Woodall, C.W. 2022. Chapter 6: FIA Carbon Attributes. In Sampling and estimation documentation for the Enhanced Forest Inventory and Analysis Program: 2022. Westfall, J.A., Coulston, J.W., Moisen, G.G., Andersen, H.-E., eds. Gen. Tech. Rep. NRS-GTR-207, Madison, WI: U.S. Department of Agriculture, Forest Service, Northern Research Station. 129 p. https://doi.org/10.2737/NRS-GTR-207.

EPA (2006) Municipal solid waste in the United States: 2005 Facts and figures. Office of Solid Waste, U.S. Environmental Protection Agency. Washington, D.C. (5306P) EPA530-R-06-011. Available online at: http://www.epa.gov/msw/msw99.htm.

FAO (2021) Forest product statistics. Rome, Italy: FAO Forestry Division. fao.org/forestry/statistics/en. Accessed August 16, 2021.

Frayer, W.E., and G.M. Furnival (1999) "Forest Survey Sampling Designs: A History." Journal of Forestry 97(12): 4-10.

Freed, R. (2004) Open-dump and Landfill timeline spreadsheet (unpublished). ICF International. Washington, D.C.

Hair, D. (1958) "Historical forestry statistics of the United States." Statistical Bull. 228. U.S. Department of Agriculture Forest Service, Washington, D.C.

Hair. D. and A.H. Ulrich (1963) The Demand and price situation for forest products – 1963. U.S. Department of Agriculture Forest Service, Misc Publication No. 953. Washington, D.C.

Harmon, M.E., C.W. Woodall, B. Fasth, J. Sexton, M. Yatkov. (2011) Differences between standing and downed dead tree wood density reduction factors: A comparison across decay classes and tree species. Res. Paper. NRS-15. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 40 p.

Howard, J. L. and Liang, S. (2019) U.S. timber production, trade, consumption, and price statistics 1965 to 2017. Res. Pap. FPL-RP-701. Madison, WI: USDA, Forest Service, Forest Products Laboratory.

Howard, J. L. and Jones, K.C. (2016) U.S. timber production, trade, consumption, and price statistics 1965 to 2013. Res. Pap. FPL-RP-679. Madison, WI: USDA, Forest Service, Forest Products Laboratory.

Howard, J. L. (2007) U.S. timber production, trade, consumption, and price statistics 1965 to 2005. Res. Pap. FPL-RP-637. Madison, WI: USDA, Forest Service, Forest Products Laboratory.

Howard, J. L. (2003) U.S. timber production, trade, consumption, and price statistics 1965 to 2002. Res. Pap. FPL-RP-615. Madison, WI: USDA, Forest Service, Forest Products Laboratory. Available online at: http://www.fpl.fs.fed.us/documnts/fplrp/fplrp615/fplrp615.pdf.

IPCC (2014) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. [Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M., and Troxler, T.G. (eds.)]. Switzerland.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Jenkins, J.C., D.C. Chojnacky, L.S. Heath, and R.A. Birdsey (2003) "National-scale biomass estimators for United States tree species." Forest Science 49(1):12-35.

Jandl, R., Rodeghiero, M., Martinez, C., Cotrufo, M. F., Bampa, F., van Wesemael, B., Harrison, R.B., Guerrini, I.A., deB Richter Jr., D., Rustad, L., Lorenz, K., Chabbi, A., Miglietta, F. (2014) Current status, uncertainty and future needs in soil organic carbon monitoring. Science of the Total Environment, 468, 376-383.

Johnson, K. Domke, G.M., Russell, M.B., Walters, B.F., Hom, J., Peduzzi, A., Birdsey, R., Dolan, K., Huang, W. (2017) Estimating aboveground live understory vegetation carbon in the United States. Environmental Research Letters.

Nelson, M.D., Riitters, K.H., Coulston, J.W., Domke, G.M., Greenfield, E.J., Langner, L.L., Nowak, D.J., O'Dea, C.B., Oswalt, S.N., Reeves, M.C. and Wear, D.N. (2020) Defining the United States land base: a technical document supporting the USDA Forest Service 2020 RPA assessment. Gen. Tech. Rep. NRS-191., 191, pp.1-70.

Ogle, S. M., G. M. Domke, W. A. Kurz, M. T. Rocha, T. Huffman, A. Swan, J. E. Smith, C. W. Woodall, and T. Krug. (2018) Delineating managed land for reporting national greenhouse gas emissions and removals to the United Nations framework convention on climate change. Carbon Balance and Management 13:9.

O'Neill, K.P., Amacher, M.C., Perry, C.H. (2005) Soils as an indicator of forest health: a guide to the collection, analysis, and interpretation of soil indicator data in the Forest Inventory and Analysis program. Gen. Tech. Rep. NC-258. St. Paul, MN: U.S. Department of Agriculture, Forest Service, North Central Research Station. 53 p.

Oswalt, S.N., Smith, W.B., Miles, P.D. and Pugh, S.A. (2019) Forest resources of the United States, 2017: A technical document supporting the Forest Service 2020 RPA Assessment. Gen. Tech. Rep. WO-97. Washington, DC: U.S. Department of Agriculture, Forest Service, Washington Office., 97.

Perry, C.H., C.W. Woodall, and M. Schoeneberger (2005) Inventorying trees in agricultural landscapes: towards an accounting of "working trees". In: "Moving Agroforestry into the Mainstream." Proc. 9th N. Am. Agroforestry Conf., Brooks, K.N. and Folliott, P.F. (eds.). 12-15 June 2005, Rochester, MN [CD-ROM]. Dept. of Forest Resources, Univ. Minnesota, St. Paul, MN, 12 p. Available online at: http://cinram.umn.edu/afta2005/. (verified 23 Sept 2006).

Russell, M.B.; D'Amato, A.W.; Schulz, B.K.; Woodall, C.W.; Domke, G.M.; Bradford, J.B. (2014) Quantifying understory vegetation in the U.S. Lake States: a proposed framework to inform regional forest carbon stocks. Forestry. 87: 629-638.

Russell, M.B.; Domke, G.M.; Woodall, C.W.; D'Amato, A.W. (2015) Comparisons of allometric and climate-derived estimates of tree coarse root carbon in forests of the United States. Carbon Balance and Management. 10: 20.

Skog, K.E. (2008) Sequestration of carbon in harvested wood products for the United States. Forest Products Journal 58:56-72.

Smith, J.E.; Heath, L.S.; Skog, K.E.; Birdsey, R.A. (2006) Methods for calculating forest ecosystem and harvested carbon with standard estimates for forest types of the United States. Gen. Tech. Rep. NE-343. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station. 216 p.

Smith, W. B., P. D. Miles, C. H. Perry, and S. A. Pugh (2009) Forest Resources of the United States, 2007. General Technical Report WO-78, U.S. Department of Agriculture Forest Service, Washington Office.

Smith, J.E., L.S. Heath, and M.C. Nichols (2010) U.S. Forest Carbon Calculation Tool User's Guide: Forestland Carbon Stocks and Net Annual Stock Change. General Technical Report NRS-13 revised, U.S. Department of Agriculture Forest Service, Northern Research Station, 34 p.

Smith, J.E., Domke, G.M. and Woodall, C.W. (2022) Predicting downed woody material carbon stocks in forests of the conterminous United States. Science of the Total Environment, 803, p.150061.

Soil Survey Staff (2020a) Gridded National Soil Survey Geographic (gNATSGO) Database for the Conterminous United States. United States Department of Agriculture, Natural Resources Conservation Service. Available online at https://nrcs.app.box.com/v/soils.

Soil Survey Staff (2020b) Gridded National Soil Survey Geographic (gNATSGO) Database for Alaska. United States Department of Agriculture, Natural Resources Conservation Service. Available online at https://nrcs.app.box.com/v/soils.

Steer, Henry B. (1948) Lumber production in the United States. Misc. Pub. 669, U.S. Department of Agriculture Forest Service. Washington, D.C.

Ulrich, Alice (1985) U.S. Timber Production, Trade, Consumption, and Price Statistics 1950-1985. Misc. Pub. 1453, U.S. Department of Agriculture Forest Service. Washington, D.C.

Ulrich, A.H. (1989) U.S. Timber Production, Trade, Consumption, and Price Statistics, 1950-1987. USDA Miscellaneous Publication No. 1471, U.S. Department of Agriculture Forest Service. Washington, D.C., 77.

United Nations Framework Convention on Climate Change (2013) Report on the individual review of the inventory submission of the United States of America submitted in 2012. FCCC/ARR/2012/USA. 42 p.

USDA Forest Service (2022a) Forest Inventory and Analysis National Program: Program Features. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://www.fia.fs.usda.gov/program-features/index.php. Accessed 7 October 2022.

USDA Forest Service. (2022b) Forest Inventory and Analysis National Program: FIA Data Mart. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://apps.fs.usda.gov/fia/datamart/datamart.html. Accessed on 07 October 2022.

USDA Forest Service. (2022c) Forest Inventory and Analysis National Program, FIA library: Field Guides, Methods and Procedures. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://www.fia.fs.usda.gov/library/field-guides-methods-proc/index.php. Accessed on 07 October 2022.

USDA Forest Service (2022d) Forest Inventory and Analysis National Program, FIA library: Database Documentation. U.S. Department of Agriculture, Forest Service, Washington Office. Available online at: https://www.fia.fs.usda.gov/library/database-documentation/index.php. Accessed on 07 October 2022.

U.S. Census Bureau (1976) Historical Statistics of the United States, Colonial Times to 1970, Vol. 1. Washington, D.C.

Wear, D.N., Coulston, J.W. (2015) From sink to source: Regional variation in U.S. forest carbon futures. Scientific Reports. 5: 16518.

Westfall, J.A., Woodall, C.W., Hatfield, M.A. (2013) A statistical power analysis of woody carbon flux from forest inventory data. Climatic Change. 118: 919-931.

Woodall, C.W., Coulston, J.W., Domke, G.M., Walters, B.F., Wear, D.N., Smith, J.E., Anderson, H.-E., Clough, B.J., Cohen, W.B., Griffith, D.M., Hagan, S.C., Hanou, I.S.; Nichols, M.C., Perry, C.H., Russell, M.B., Westfall, J.A., Wilson, B.T. (2015a) The U.S. Forest Carbon Accounting Framework: Stocks and Stock change 1990-2016. Gen. Tech. Rep. NRS-154. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 49 pp.

Woodall, C.W., L.S. Heath, G.M. Domke, and M.C. Nichols (2011a) Methods and equations for estimating aboveground volume, biomass, and carbon for trees in the U.S. forest inventory, 2010. Gen. Tech. Rep. NRS-88. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 30 p.

Woodall, C.W., Amacher, M.C., Bechtold, W.A., Coulston, J.W., Jovan, S., Perry, C.H., Randolph, K.C., Schulz, B.K., Smith, G.C., Tkacz, B., Will-Wolf, S. (2011b) "Status and future of the forest health indicators program of the United States." Environmental Monitoring and Assessment. 177: 419-436.

Woodall, C.W., and V.J. Monleon (2008) Sampling protocol, estimation, and analysis procedures for the down woody materials indicator of the FIA program. Gen. Tech. Rep. NRS-22. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 68 p.

Woodall, C.W., Walters, B.F., Oswalt, S.N., Domke, G.M., Toney, C., Gray, A.N. (2013) Biomass and carbon attributes of downed woody materials in forests of the United States. Forest Ecology and Management 305: 48-59.

Woodall, C.W., Walters, B.F., Coulston, J.W., D'Amato, A.W., Domke, G.M., Russell, M.B., Sowers, P.A. (2015b) Monitoring network confirms land use change is a substantial component of the forest carbon sink in the eastern United States. Scientific Reports. 5: 17028.

Zhu, Zhiliang, and McGuire, A.D., eds. (2016) Baseline and projected future carbon storage and greenhouse-gas fluxes in ecosystems of Alaska: U.S. Geological Survey Professional Paper 1826, 196 p., Available online at: http://dx.doi.org/10.3133/pp1826.

Forest Land Remaining Forest Land: Non-CO₂ Emissions from **Forest Fires**

Eidenshink, J., Schwind, B., Brewer, K., Zhu, Z.L., Quayle, B. and Howard, S. (2007) A project for monitoring trends in burn severity. Fire ecology, 3(1), pp.3-21.

French, N.H.F., W.J. de Groot, L.K. Jenkins, B.M. Rogers, E.C. Alvarado, B. Amiro, B. de Jong, S. Goetz, E. Hoy, E. Hyer, R. Keane, D. McKenzie, S.G. McNulty, B.E Law, R. Ottmar, D.R. Perez-Salicrup, J. Randerson, K.M. Robertson, and M. Turetsky (2011) "Model comparisons for estimating carbon emissions from North American wildland fire." Journal of Geophysical Research 116. 10.1029/2010JG001469

French, N.H.F., D. McKenzie, T. Erickson, B. Koziol, M. Billmire, K.A. Endsley, N.K.Y. Scheinerman, L. Jenkins, M.E. Miller, R. Ottmar, and S. Prichard (2014) "Modeling regional-scale fire emissions with the Wildland Fire Emissions Information System." Earth Interactions 18, no. 16

Giglio, L., Boschetti, L., Roy, D. P., Humber, M. L., and Justice, C. O. (2018) The Collection 6 MODIS burned area mapping algorithm and product. Remote Sensing of Environment, 217, 72-85.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

Larkin, N. K., S. Raffuse, and T. T. Strand (2014) Wildland fire emissions, carbon, and climate: U.S. emissions inventories. For. Ecol. Manage. 317:61-69. doi:10.1016/j.foreco.2013.09.012.

MTBS Data Access: Fire Level Geospatial Data (2021, April - revised) MTBS Project (USDA Forest Service/U.S. Geological Survey). Available online at: http://mtbs.gov/direct-download. Accessed on 21 April 2021.

Ogle, S. M., G. M. Domke, W. A. Kurz, M. T. Rocha, T. Huffman, A. Swan, J. E. Smith, C. W. Woodall, and T. Krug. (2018) Delineating managed land for reporting national greenhouse gas emissions and removals to the United Nations framework convention on climate change. Carbon Balance and Management 13:9.

Forest Land Remaining Forest Land: N₂O Emissions from Soils

Albaugh, T.J., Allen, H.L., Fox, T.R. (2007) Historical Patterns of Forest Fertilization in the Southeastern United States from 1969 to 2004. Southern Journal of Applied Forestry, 31, 129-137(9).

Binkley, D. (2004) Email correspondence regarding the 95 percent confidence interval for area estimates of southern pine plantations receiving N fertilizer (±20%) and the rate applied for areas receiving N fertilizer (100 to 200 pounds/acre). Dan Binkley, Department of Forest, Rangeland, and Watershed Stewardship, Colorado State University and Stephen Del Grosso, Natural Resource Ecology Laboratory, Colorado State University. September 19, 2004.

Binkley, D., R. Carter, and H.L. Allen (1995) Nitrogen Fertilization Practices in Forestry. In: Nitrogen Fertilization in the Environment, P.E. Bacon (ed.), Marcel Decker, Inc., New York.

Briggs, D. (2007) Management Practices on Pacific Northwest West-Side Industrial Forest Lands, 1991-2005: With Projections to 2010. Stand Management Cooperative, SMC Working Paper Number 6, College of Forest Resources, University of Washington, Seattle.

Fox, T.R., H. L. Allen, T.J. Albaugh, R. Rubilar, and C.A. Carlson (2007) Tree Nutrition and Forest Fertilization of Pine Plantations in the Southern United States. Southern Journal of Applied Forestry, 31, 5-11.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

USDA Forest Service (2001) U.S. Forest Facts and Historical Trends. FS-696. U.S. Department of Agriculture Forest Service, Washington, D.C. Available online at: http://www.fia.fs.fed.us/library/ForestFactsMetric.pdf.

Forest Land Remaining Forest Land: Drained Organic Soils

IPCC (2014) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands, Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds.). Published: IPCC, Switzerland.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change, H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

STATSGO2 (2016) Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. U.S. General Soil Map (STATSGO2). Available online at https://sdmdataaccess.sc.egov.usda.gov. Accessed 10 November 2016.

USDA Forest Service (2022b) Forest Inventory and Analysis National Program: FIA Data Mart. U.S. Department of Agriculture Forest Service. Washington, DC; 2015. Available online at https://apps.fs.usda.gov/fia/datamart/datamart.html. Accessed 30 March 2022.

Land Converted to Forest Land

Birdsey, R. (1996) "Carbon Storage for Major Forest Types and Regions in the Conterminous United States." In R.N. Sampson and D. Hair, (eds.). Forest and Global Change, Volume 2: Forest Management Opportunities for Mitigating Carbon Emissions. American Forests. Washington, D.C., 1-26 and 261-379 (appendices 262 and 263).

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Domke, G.M., J.E. Smith, and C.W. Woodall. (2011) Accounting for density reduction and structural loss in standing dead trees: Implications for forest biomass and carbon stock estimates in the United States. Carbon Balance and Management. 6:14.Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., Nave, L., Swanston, C. (2017) Toward inventory-based estimates of soil organic carbon in forests of the United States. Ecological Applications. 27(4), 1223-1235.

Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., and Smith, J.E. (2016) A framework for estimating litter carbon stocks in forests of the United States. Science of the Total Environment 557–558: 469–478.

Domke, G.M., Woodall, C.W., Walters, B.F., Smith, J.E. (2013) From models to measurements: comparing down dead wood carbon stock estimates in the U.S. forest inventory. PLoS ONE 8(3): e59949.

Harmon, M.E., C.W. Woodall, B. Fasth, J. Sexton, M. Yatkov. (2011) Differences between standing and downed dead tree wood density reduction factors: A comparison across decay classes and tree species. Res. Paper. NRS-15. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 40 p.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Jenkins, J.C., D.C. Chojnacky, L.S. Heath, and R.A. Birdsey (2003) "National-scale biomass estimators for United States tree species." Forest Science 49(1):12-35.Ogle, S.M., M.D. Eve, F.J. Breidt, and K. Paustian (2003) "Uncertainty in estimating land use and management impacts on soil organic carbon storage for U.S. agroecosystems between 1982 and 1997." Global Change Biology 9:1521-1542.

Ogle, S.M., F.J. Breidt, and K. Paustian. (2006) "Bias and variance in model results due to spatial scaling of measurements for parameterization in regional assessments." Global Change Biology 12:516-523.

Smith, J.E.; Heath, L.S.; Skog, K.E.; Birdsey, R.A. (2006) Methods for calculating forest ecosystem and harvested carbon with standard estimates for forest types of the United States. Gen. Tech. Rep. NE-343. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station. 216 p.

USDA Forest Service (2022b) Forest Inventory and Analysis National Program: FIA Data Mart. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://apps.fs.usda.gov/fia/datamart/datamart.htmlAccessed on 07 October 2022.

USDA Forest Service (2022c) Forest Inventory and Analysis National Program, FIA library: Field Guides, Methods and Procedures. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://www.fia.fs.usda.gov/library/field-guides-methods-proc/index.php. Accessed on 07 October 2022.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory, Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

USDA-NRCS (1997) "National Soil Survey Laboratory Characterization Data," Digital Data, Natural Resources Conservation Service, U.S. Department of Agriculture. Lincoln, NE.

Woodall, C.W., L.S. Heath, G.M. Domke, and M.C. Nichols (2011a) Methods and equations for estimating aboveground volume, biomass, and carbon for trees in the U.S. forest inventory, 2010. Gen. Tech. Rep. NRS-88. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 30 p.

Woodall, C.W., and V.J. Monleon (2008) Sampling protocol, estimation, and analysis procedures for the down woody materials indicator of the FIA program. Gen. Tech. Rep. NRS-22. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 68 p.

Woodall, C.W., Walters, B.F., Coulston, J.W., D'Amato, A.W., Domke, G.M., Russell, M.B., Sowers, P.A. (2015b) Monitoring network confirms land use change is a substantial component of the forest carbon sink in the eastern United States. Scientific Reports. 5: 17028.

Woodall, C.W., Walters, B.F., Oswalt, S.N., Domke, G.M., Toney, C., Gray, A.N. (2013) Biomass and carbon attributes of downed woody materials in forests of the United States. Forest Ecology and Management 305: 48-59.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies. ISPRS Journal of Photogrammetry and Remote Sensing 146: 108-123.

Cropland Remaining Cropland

Armentano, T. V., and E.S. Menges (1986) Patterns of change in the carbon balance of organic soil-wetlands of the temperate zone. *Journal of Ecology* 74: 755-774.

Brady, N.C. and R.R. Weil (1999) The Nature and Properties of Soils. Prentice Hall. Upper Saddle River, NJ, 881.

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Cheng, B., and D.M. Titterington (1994) "Neural networks: A review from a statistical perspective." Statistical science 9: 2-30.

Claassen, R., M. Bowman, J. McFadden, D. Smith, and S. Wallander (2018) Tillage intensity and conservation cropping in the United States, EIB 197. United States Department of Agriculture, Economic Research Service, Washington, D.C.

Conant, R. T., K. Paustian, and E.T. Elliott (2001) "Grassland management and conversion into grassland: effects on soil carbon." *Ecological Applications* 11: 343-355.

CTIC (2004) National Crop Residue Management Survey: 1989-2004. Conservation Technology Information Center, Purdue University, Available online at: http://www.ctic.purdue.edu/CRM/.

Daly, C., R.P. Neilson, and D.L. Phillips (1994) "A Statistical-Topographic Model for Mapping Climatological Precipitation Over Mountainous Terrain." *Journal of Applied Meteorology* 33:140-158.

Del Grosso, S.J., W.J. Parton, A.R. Mosier, M.D. Hartman, J. Brenner, D.S. Ojima, and D.S. Schimel (2001) "Simulated Interaction of Carbon Dynamics and Nitrogen Trace Gas Fluxes Using the DAYCENT Model." In Modeling Carbon and Nitrogen Dynamics for Soil Management, Schaffer, M., L. Ma, S. Hansen, (eds.). CRC Press, Boca Raton, Florida, pp. 303-332.

Del Grosso, S.J., S.M. Ogle, W.J. Parton (2011) Soil organic matter cycling and greenhouse gas accounting methodologies, Chapter 1, pp 3-13 DOI: 10.1021/bk-2011-1072.ch001. In: Understanding Greenhouse Gas Emissions from Agricultural Management, L. Guo, A. Gunasekara, L. McConnell (eds.). American Chemical Society, Washington, D.C.

Edmonds, L., R. L. Kellogg, B. Kintzer, L. Knight, C. Lander, J. Lemunyon, D. Meyer, D.C. Moffitt, and J. Schaefer (2003) "Costs associated with development and implementation of Comprehensive Nutrient Management Plans." Part I—Nutrient management, land treatment, manure and wastewater handling and storage, and recordkeeping. Natural Resources Conservation Service, U.S. Department of Agriculture. Available online at: http://www.nrcs.usda.gov/technical/land/pubs/cnmp1.html.

EPA (2022) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2020. U.S. Environmental Protection Agency, EPA 430-R-22-003. https://www.epa.gov/ghgemissions/draft-inventory-us-greenhouse-gas-emissions-and-sinks-1990-2020.

Euliss, N., and R. Gleason (2002) Personal communication regarding wetland restoration factor estimates and restoration activity data. Ned Euliss and Robert Gleason of the U.S. Geological Survey, Jamestown, ND, to Stephen Ogle of the National Resource Ecology Laboratory, Fort Collins, CO. August 2002.

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and Wickham, J. (2011) Completion of the 2006 National Land Cover Database for the Conterminous United States, PE&RS, Vol. 77(9):858-864.

Griscom, B. W., Adams, J., Ellis, P. W., Houghton, R. A., Lomax, G., Miteva, D. A., Schlesinger, W. H., Shoch, D., Siikamäki, J. V., Smith, P., Woodbury, P., Zganjar, C., Blackman, A., Campari, J., Conant, R. T., Delgado, C., Elias, P., Gopalakrishna, T., Hamsik, M. R., Herrero, M., Kiesecker, J., Landis, E., Laestadius, L., Leavitt, S. M., Minnemeyer, S., Polasky, S., Potapov, P., Putz, F. E., Sanderman, J., Silvius, M., Wollenberg, E. & Fargione, J. (2017) "Natural climate solutions." Proceedings of the National Academy of Sciences of the United States of America 114(44): 11645-11650.

Hijmans, R.J., S.E. Cameron, J.L. Parra, P.G. Jones and A. Jarvis (2005) Very high resolution interpolated climate surfaces for global land areas. International Journal of Climatology 25: 1965-1978.

Homer, C., Dewitz, J., Fry, J., Coan, M., Hossain, N., Larson, C., Herold, N., McKerrow, A., VanDriel, J.N., and Wickham, J. (2007) Completion of the 2001 National Land Cover Database for the Conterminous United States. Photogrammetric Engineering and Remote Sensing, Vol. 73, No. 4, pp 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information. Photogrammetric Engineering and Remote Sensing, v. 81, no. 5, p. 345-354.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2003) Good Practice Guidance for Land Use, Land-Use Change, and Forestry. The Intergovernmental Panel on Climate Change, National Greenhouse Gas Inventories Programme, J. Penman, et al., eds. August 13, 2004. Available online at: http://www.ipcc-nggip.iges.or.jp/public/gpglulucf/gpglulucf.htm.

Lal, R., Kimble, J. M., Follett, R. F. & Cole, C. V. (1998) The potential of U.S. cropland to sequester carbon and mitigate the greenhouse effect. Chelsea, MI: Sleeping Bear Press, Inc.

Little, R. (1988) "Missing-data adjustments in large surveys." Journal of Business and Economic Statistics 6: 287-

McGill, W.B., and C.V. Cole (1981) Comparative aspects of cycling of organic C, N, S and P through soil organic matter. Geoderma 26:267-286.

Metherell, A.K., L.A. Harding, C.V. Cole, and W.J. Parton (1993) "CENTURY Soil Organic Matter Model Environment." Agroecosystem version 4.0. Technical documentation, GPSR Tech. Report No. 4, USDA/ARS, Ft. Collins, CO.

Mesinger, F., G. DiMego, E. Kalnay, K. Mitchell, P. C. Shafran, W. Ebisuzaki, D. Jovic, J. Woollen, E. Rogers, E. H. Berbery, M. B. Ek, Y. Fan, R. Grumbine, W. Higgins, H. Li, Y. Lin, G. Manikin, D. Parrish, and W. Shi (2006) North American regional reanalysis. Bulletin of the American Meteorological Society 87:343-360.

NRCS (1999) Soil Taxonomy: A basic system of soil classification for making and interpreting soil surveys, 2nd Edition. Agricultural Handbook Number 436, Natural Resources Conservation Service, U.S. Department of Agriculture, Washington, D.C.

NRCS (1997) "National Soil Survey Laboratory Characterization Data," Digital Data, Natural Resources Conservation Service, U.S. Department of Agriculture. Lincoln, NE.

NRCS (1981) Land Resource Regions and Major Land Resource Areas of the United States, USDA Agriculture Handbook 296, United States Department of Agriculture, Natural Resources Conservation Service, National Soil Survey Cente., Lincoln, NE, pp. 156.

Ogle, S. M., Alsaker, C., Baldock, J., Bernoux, M., Breidt, F. J., McConkey, B., Regina, K. & Vazquez-Amabile, G. G. (2019) "Climate and Soil Characteristics Determine Where No-Till Management Can Store Carbon in Soils and Mitigate Greenhouse Gas Emissions." Scientific Reports 9(1): 11665.

Ogle, S.M., F.J. Breidt, M. Easter, S. Williams, K. Killian, and K. Paustian (2010) "Scale and uncertainty in modeled soil organic carbon stock changes for U.S. croplands using a process-based model." Global Change Biology 16:810-

Ogle, S.M., F.J. Breidt, M. Easter, S. Williams and K. Paustian (2007) "Empirically-Based Uncertainty Associated with Modeling Carbon Sequestration Rates in Soils." Ecological Modeling 205:453-463.

Case 5:23-cv-00304-H

Ogle, S.M., F.J. Breidt, and K. Paustian (2006) "Bias and variance in model results due to spatial scaling of measurements for parameterization in regional assessments." Global Change Biology 12:516-523.

Ogle, S. M., et al. (2005) "Agricultural management impacts on soil organic carbon storage under moist and dry climatic conditions of temperate and tropical regions." Biogeochemistry 72: 87-121.

Ogle, S.M., M.D. Eve, F.J. Breidt, and K. Paustian (2003) "Uncertainty in estimating land use and management impacts on soil organic carbon storage for U.S. agroecosystems between 1982 and 1997." Global Change Biology 9:1521-1542.

Parton, W.J., M.D. Hartman, D.S. Ojima, and D.S. Schimel (1998) "DAYCENT: Its Land Surface Submodel: Description and Testing". Glob. Planet. Chang. 19: 35-48.

Parton, W.J., D.S. Ojima, C.V. Cole, and D.S. Schimel (1994) "A General Model for Soil Organic Matter Dynamics: Sensitivity to litter chemistry, texture and management," in Quantitative Modeling of Soil Forming Processes. Special Publication 39, Soil Science Society of America, Madison, WI, 147-167.

Parton, W.J., D.S. Schimel, C.V. Cole, D.S. Ojima (1987) "Analysis of factors controlling soil organic matter levels in Great Plains grasslands." Soil Science Society of America Journal 51:1173-1179.

Parton, W.J., J.W.B. Stewart, C.V. Cole. (1988) "Dynamics of C, N, P, and S in grassland soils: a model." Biogeochemistry 5:109-131.

Paustian, K., et al. (1997a) "Agricultural soils as a sink to mitigate CO₂ emissions." Soil Use and Management 13: 230-244.

Paustian, K., et al. (1997b) Management controls on soil carbon. In Soil organic matter in temperate agroecosystems: long-term experiments in North America (Paul E.A., K. Paustian, and C.V. Cole, eds.). Boca Raton, CRC Press, pp. 15-49.

Potter, C. S., J.T. Randerson, C.B. Fields, P.A. Matson, P.M. Vitousek, H.A. Mooney, and S.A. Klooster (1993) "Terrestrial ecosystem production: a process model based on global satellite and surface data." Global Biogeochemical Cycles 7:811-841.

Potter, C., S. Klooster, A. Huete, and V. Genovese (2007) Terrestrial carbon sinks for the United States predicted from MODIS satellite data and ecosystem modeling. Earth Interactions 11, Article No. 13, DOI 10.1175/EI228.1.

PRISM Climate Group (2018) PRISM Climate Data, Oregon State University, http://prism.oregonstate.edu, downloaded 18 July 2018.

Pukelsheim, F. (1994) "The 3-Sigma-Rule." American Statistician 48:88-91

Soil Survey Staff (2016) State Soil Geographic (STATSGO) Database for State. Natural Resources Conservation Service, United States Department of Agriculture. Available online at: http://www.ncgc.nrcs.usda.gov/products/datasets/statsgo/index.html.

Spencer, S., S.M. Ogle, F.J. Breidt, J. Goebel, and K. Paustian. (2011) "Designing a national soil carbon monitoring network to support climate change policy: a case example for US agricultural lands." Greenhouse Gas Management & Measurement 1: 167-178.

Towery, D. (2001) Personal Communication. Dan Towery regarding adjustments to the CTIC (1998) tillage data to reflect long-term trends, Conservation Technology Information Center, West Lafayette, IN, and Marlen Eve, National Resource Ecology Laboratory, Fort Collins, CO. February 2001.

USDA-ERS (2018) Agricultural Resource Management Survey (ARMS) Farm Financial and Crop Production Practices: Tailored Reports. Available online at: https://www.ers.usda.gov/data-products/arms-farm-financial-and-cropproduction-practices/.

USDA-ERS (1997) Cropping Practices Survey Data—1995. Economic Research Service, United States Department of Agriculture. Available online at: http://www.ers.usda.gov/data/archive/93018/.

USDA-FSA (2015) Conservation Reserve Program Monthly Summary – September 2015. U.S. Department of Agriculture, Farm Service Agency, Washington, D.C. Available online at: https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/Conservation/PDF/sep2015summary.pdf.

USDA-NASS (2017) 2017 Census of Agriculture. USDA National Agricultural Statistics Service, Complete data available at http://www.nass.usda.gov/AgCensus.

USDA-NASS (2012) 2012 Census of Agriculture. USDA National Agricultural Statistics Service, Complete data available at http://www.nass.usda.gov/AgCensus.

USDA-NASS (2004) Agricultural Chemical Usage: 2003 Field Crops Summary. Report AgCh1(04)a. National Agricultural Statistics Service, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu/reports/nassr/other/pcu-bb/agcs0504.pdfH.

USDA-NASS (1999) Agricultural Chemical Usage: 1998 Field Crops Summary. Report AgCH1(99). National Agricultural Statistics Service, U.S. Department of Agriculture, Washington, DC. Available online at: http://usda.mannlib.cornell.edu/reports/nassr/other/pcu-bb/agch0599.pdf.

USDA-NASS (1992) Agricultural Chemical Usage: 1991 Field Crops Summary. Report AgCh1(92). National Agricultural Statistics Service, U.S. Department of Agriculture, Washington, D.C. Available online at: http://usda.mannlib.cornell.edu/reports/nassr/other/pcu-bb/agch0392.txtH.

USDA-NRCS (2012) Assessment of the Effects of Conservation Practices on Cultivated Cropland in the Upper Mississippi River Basin. U.S. Department of Agriculture, Natural Resources Conservation Service, https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/stelprdb1042093.pdf.

USDA-NRCS (2018a) Summary Report: 2015 National Resources Inventory. Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

USDA-NRCS (2018b) CEAP Cropland Farmer Surveys. USDA Natural Resources Conservation Service. https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/ceap/na/?cid=nrcs143 014163.

USDA-NRCS (2000) Digital Data and Summary Report: 1997 National Resources Inventory. Revised December 2000. Resources Inventory Division, Natural Resources Conservation Service, United States Department of Agriculture, Beltsville, MD.

Van Buuren, S. (2012) "Flexible imputation of missing data." Chapman & Hall/CRC, Boca Raton, FL.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) "A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies." ISPRS Journal of Photogrammetry and Remote Sensing 146: 108-123.

Zomer RJ, Trabucco A, Bossio DA, van Straaten O, Verchot LV (2008) Climate Change Mitigation: A Spatial Analysis of Global Land Suitability for Clean Development Mechanism Afforestation and Reforestation. Agric. Ecosystems and Envir. 126: 67-80.

Zomer RJ, Bossio DA, Trabucco A, Yuanjie L, Gupta DC & Singh VP (2007) Trees and Water: Smallholder Agroforestry on Irrigated Lands in Northern India. Colombo, Sri Lanka: International Water Management Institute. pp 45. (IWMI Research Report 122).

Land Converted to Cropland

Sampson and D. Hair, (eds.). Forest and Global Change, Volume 2: Forest Management Opportunities for Mitigating Carbon Emissions. American Forests. Washington, D.C., 1-26 and 261-379 (appendices 262 and 263).

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Del Grosso, S.J., W.J. Parton, A.R. Mosier, M.D. Hartman, J. Brenner, D.S. Ojima, and D.S. Schimel (2001) "Simulated Interaction of Carbon Dynamics and Nitrogen Trace Gas Fluxes Using the DAYCENT Model." In *Modeling Carbon and Nitrogen Dynamics for Soil Management*, Schaffer, M., L. Ma, S. Hansen, (eds.). CRC Press, Boca Raton, Florida, pp. 303-332.

Del Grosso, S.J., S.M. Ogle, W.J. Parton (2011) "Soil organic matter cycling and greenhouse gas accounting methodologies." Chapter 1, pp 3-13 DOI: 10.1021/bk-2011-1072.ch001. In: *Understanding Greenhouse Gas Emissions from Agricultural Management* (L. Guo, A. Gunasekara, L. McConnell. Eds.), American Chemical Society, Washington, D.C.

Del Grosso, S.J., W.J. Parton, A.R. Mosier, M.D. Hartman, J. Brenner, D.S. Ojima, and D.S. Schimel (2001) "Simulated Interaction of Carbon Dynamics and Nitrogen Trace Gas Fluxes Using the DAYCENT Model." In Schaffer, M., L. Ma, S. Hansen, (eds.); *Modeling Carbon and Nitrogen Dynamics for Soil Management*. CRC Press. Boca Raton, Florida. 303-332.

Domke, G.M., J.E. Smith, and C.W. Woodall. (2011) "Accounting for density reduction and structural loss in standing dead trees: Implications for forest biomass and carbon stock estimates in the United States". *Carbon Balance and Management* 6:14.

Domke, G.M., et al. (2013) "From models to measurements: comparing down dead wood carbon stock estimates in the U.S. forest inventory." *PLoS ONE* 8(3): e59949.

Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., and Smith, J.E. (2016) "A framework for estimating litter carbon stocks in forests of the United States." *Science of the Total Environment* 557–558: 469–478.

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and Wickham, J. (2011) "Completion of the 2006 National Land Cover Database for the Conterminous United States." *PE&RS*, Vol. 77(9):858-864.

Harmon, M.E., C.W. Woodall, B. Fasth, J. Sexton, M. Yatkov. (2011) Differences between standing and downed dead tree wood density reduction factors: A comparison across decay classes and tree species. Res. Paper. NRS-15. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 40 p.

Homer, C., Dewitz, J., Fry, J., Coan, M., Hossain, N., Larson, C., Herold, N., McKerrow, A., VanDriel, J.N., and Wickham, J. (2007) "Completion of the 2001 National Land Cover Database for the Conterminous United States." *Photogrammetric Engineering and Remote Sensing*, Vol. 73, No. 4, pp 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) "Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information." *Photogrammetric Engineering and Remote Sensing* 81: 345-354.

Houghton, R.A., et al. (1983) "Changes in the carbon content of terrestrial biota and soils between 1860 and 1980: a net release of CO₂ to the atmosphere." *Ecological Monographs* 53: 235-262.

Houghton, R. A. and Nassikas, A. A. (2017) "Global and regional fluxes of carbon from land use and land cover change 1850–2015." *Global Biogeochemical Cycles* 31(3): 456-472.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Jenkins, J.C., D.C. Chojnacky, L.S. Heath, and R.A. Birdsey (2003) "National-scale biomass estimators for United States tree species." *Forest Science* 49(1):12-35.

Metherell, A.K., L.A. Harding, C.V. Cole, and W.J. Parton (1993) *CENTURY Soil Organic Matter Model Environment. Agroecosystem version 4.0.* Technical documentation, GPSR Tech. Report No. 4, USDA/ARS, Ft. Collins, CO.

Ogle, S.M., F.J. Breidt, M. Easter, S. Williams, K. Killian, and K. Paustian (2010) "Scale and uncertainty in modeled soil organic carbon stock changes for U.S. croplands using a process-based model." Global Change Biology 16:810-

Ogle, S.M., M.D. Eve, F.J. Breidt, and K. Paustian (2003) "Uncertainty in estimating land use and management impacts on soil organic carbon storage for U.S. agroecosystems between 1982 and 1997." Global Change Biology 9:1521-1542.

Parton, W.J., M.D. Hartman, D.S. Ojima, and D.S. Schimel (1998) "DAYCENT: Its Land Surface Submodel: Description and Testing". Glob. Planet. Chang. 19: 35-48.

Parton, W.J., D.S. Ojima, C.V. Cole, and D.S. Schimel (1994) "A General Model for Soil Organic Matter Dynamics: Sensitivity to litter chemistry, texture and management," in Quantitative Modeling of Soil Forming Processes. Special Publication 39, Soil Science Society of America, Madison, WI, 147-167.

Parton, W.J., D.S. Schimel, C.V. Cole, D.S. Ojima (1987) "Analysis of factors controlling soil organic matter levels in Great Plains grasslands." Soil Science Society of America Journal 51:1173-1179.

Parton, W.J., J.W.B. Stewart, C.V. Cole. (1988) "Dynamics of C, N, P, and S in grassland soils: a model." Biogeochemistry 5:109-131.

PRISM Climate Group (2018) PRISM Climate Data, Oregon State University, http://prism.oregonstate.edu, downloaded 18 July 2018.

Smith, J.E.; Heath, L.S.; Skog, K.E.; Birdsey, R.A. (2006) Methods for calculating forest ecosystem and harvested carbon with standard estimates for forest types of the United States. Gen. Tech. Rep. NE-343. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station. 216 p.

Tubiello, F. N., et al. (2015) "The Contribution of Agriculture, Forestry and other Land Use activities to Global Warming, 1990-2012." Global Change Biology 21:2655-2660.

USDA Forest Service. (2022) Forest Inventory and Analysis National Program: FIA Data Mart. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://apps.fs.usda.gov/fia/datamart/datamart.html. Accessed on 07 October 2022.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory. Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

Woodall, C.W., and V.J. Monleon (2008) Sampling protocol, estimation, and analysis procedures for the down woody materials indicator of the FIA program. Gen. Tech. Rep. NRS-22. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 68 p.

Woodall, C.W., L.S. Heath, G.M. Domke, and M.C. Nichols (2011) Methods and equations for estimating aboveground volume, biomass, and carbon for trees in the U.S. forest inventory, 2010. Gen. Tech. Rep. NRS-88. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 30 p.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) "A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies." ISPRS Journal of Photogrammetry and Remote Sensing 146: 108-123.

Grassland Remaining Grassland: Soil Carbon Stock Changes

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Del Grosso, S.J., S.M. Ogle, W.J. Parton (2011) Soil organic matter cycling and greenhouse gas accounting methodologies, Chapter 1, pp 3-13 DOI: 10.1021/bk-2011-1072.ch001. In: Understanding Greenhouse Gas Emissions from Agricultural Management (L. Guo, A. Gunasekara, L. McConnell. Eds.), American Chemical Society, Washington, D.C.

Del Grosso, S.J., W.J. Parton, A.R. Mosier, M.D. Hartman, J. Brenner, D.S. Ojima, and D.S. Schimel (2001) "Simulated Interaction of Carbon Dynamics and Nitrogen Trace Gas Fluxes Using the DAYCENT Model." In Modeling Carbon and Nitrogen Dynamics for Soil Management, Schaffer, M., L. Ma, S. Hansen, (eds.). CRC Press, Boca Raton, Florida, pp. 303-332.

Edmonds, L., R. L. Kellogg, B. Kintzer, L. Knight, C. Lander, J. Lemunyon, D. Meyer, D.C. Moffitt, and J. Schaefer (2003) "Costs associated with development and implementation of Comprehensive Nutrient Management Plans." Part I—Nutrient management, land treatment, manure and wastewater handling and storage, and recordkeeping. Natural Resources Conservation Service, U.S. Department of Agriculture. Available online at: http://www.nrcs.usda.gov/technical/land/pubs/cnmp1.html.

EPA (1999) Biosolids Generation, Use and Disposal in the United States. Office of Solid Waste, U.S. Environmental Protection Agency. Available online at: http://biosolids.policy.net/relatives/18941.PDF.

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and Wickham, J. (2011) Completion of the 2006 National Land Cover Database for the Conterminous United States, PE&RS, Vol. 77(9):858-864.

Homer, C., Dewitz, J., Fry, J., Coan, M., Hossain, N., Larson, C., Herold, N., McKerrow, A., VanDriel, J.N., and Wickham, J. (2007) Completion of the 2001 National Land Cover Database for the Conterminous United States. Photogrammetric Engineering and Remote Sensing, Vol. 73, No. 4, pp 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information. Photogrammetric Engineering and Remote Sensing, v. 81, no. 5, p. 345-354.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Kellogg, R.L., C.H. Lander, D.C. Moffitt, and N. Gollehon (2000) Manure Nutrients Relative to the Capacity of Cropland and Pastureland to Assimilate Nutrients: Spatial and Temporal Trends for the United States. U.S. Department of Agriculture, Washington, D.C. Publication number nps00-0579.

Metherell, A.K., L.A. Harding, C.V. Cole, and W.J. Parton (1993) "CENTURY Soil Organic Matter Model Environment." Agroecosystem version 4.0. Technical documentation, GPSR Tech. Report No. 4, USDA/ARS, Ft. Collins, CO.

NEBRA (2007) A National Biosolids Regulation, Quality, End Use & Disposal Survey. North East Biosolids and Residuals Association. July 21, 2007.

Nusser, S.M. and J.J. Goebel (1997) The national resources inventory: a long-term multi-resource monitoring programme. *Environmental and Ecological Statistics* 4:181-204.

Ogle, S.M., F.J. Breidt, M. Easter, S. Williams, K. Killian, and K. Paustian (2010) "Scale and uncertainty in modeled soil organic carbon stock changes for U.S. croplands using a process-based model." *Global Change Biology* 16:810-820.

Ogle, S.M., M.D. Eve, F.J. Breidt, and K. Paustian (2003) "Uncertainty in estimating land use and management impacts on soil organic carbon storage for U.S. agroecosystems between 1982 and 1997." *Global Change Biology* 9:1521-1542.

Parton, W.J., D.S. Ojima, C.V. Cole, and D.S. Schimel (1994) "A General Model for Soil Organic Matter Dynamics: Sensitivity to litter chemistry, texture and management," in Quantitative Modeling of Soil Forming Processes. Special Publication 39, *Soil Science Society of America*, Madison, WI, 147-167.

Parton, W.J., D.S. Schimel, C.V. Cole, D.S. Ojima (1987) "Analysis of factors controlling soil organic matter levels in Great Plains grasslands." Soil Science Society of America Journal 51:1173-1179.

Parton, W.J., J.W.B. Stewart, C.V. Cole. (1988) "Dynamics of C, N, P, and S in grassland soils: a model." Biogeochemistry 5:109-131.

Parton, W.J., M.D. Hartman, D.S. Ojima, and D.S. Schimel (1998) "DAYCENT: Its Land Surface Submodel: Description and Testing". Glob. Planet. Chang. 19: 35-48.PRISM Climate Group, Oregon State University, http://prism.oregonstate.edu, created 24 July 2015.

PRISM Climate Group (2018) PRISM Climate Data, Oregon State University, http://prism.oregonstate.edu, downloaded 18 July 2018.

United States Bureau of Land Management (BLM) (2014) Rangeland Inventory, Monitoring, and Evaluation Reports. Bureau of Land Management. U.S. Department of the Interior. Available online at: http://www.blm.gov/wo/st/en/prog/more/rangeland management/rangeland inventory.html.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory. Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

USDA Forest Service. (2022) Forest Inventory and Analysis National Program: FIA Data Mart. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://apps.fs.usda.gov/fia/datamart/datamart.html. Accessed on 07 October 2022.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) "A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies." ISPRS Journal of Photogrammetry and Remote Sensing 146: 108-123.

Grassland Remaining Grassland: Non-CO₂ Emissions from **Grassland Fires**

Anderson, R.C. Evolution and origin of the Central Grassland of North America: climate, fire and mammalian grazers. Journal of the Torrey Botanical Society 133: 626-647.

Andreae, M.O. and P. Merlet (2001) Emission of trace gases and aerosols from biomass burning. Global Biogeochemical Cycles 15:955-966.

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Chapin, F.S., S.F. Trainor, O. Huntington, A.L. Lovecraft, E. Zavaleta, D.C. Natcher, A.D. McGuire, J.L. Nelson, L. Ray, M. Calef, N. Fresco, H. Huntington, T.S. Rupp, L. DeWilde, and R.L. Naylor (2008) Increasing wildfires in Alaska's Boreal Forest: Pathways to potential solutions of a wicked problem. *Bioscience* 58:531-540.

Daubenmire, R. (1968) Ecology of fire in grasslands. Advances in Ecological Research 5:209-266.

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and Wickham, J. (2011) Completion of the 2006 National Land Cover Database for the Conterminous United States, PE&RS, Vol. 77(9):858-864.

Homer, C., Dewitz, J., Fry, J., Coan, M., Hossain, N., Larson, C., Herold, N., McKerrow, A., VanDriel, J.N., and Wickham, J. (2007) Completion of the 2001 National Land Cover Database for the Conterminous United States. Photogrammetric Engineering and Remote Sensing, Vol. 73, No. 4, pp 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) Completion of the 2011 National Land Cover Database for the conterminous United StatesRepresenting a decade of land cover change information. Photogrammetric Engineering and Remote Sensing, v. 81, no. 5, p. 345-354.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

Ogle, S.M., S. Spencer, M. Hartman, L. Buendia, L. Stevens, D. du Toit, J. Witi (2016) "Developing national baseline GHG emissions and analyzing mitigation potentials for agriculture and forestry using an advanced national GHG inventory software system." In Advances in Agricultural Systems Modeling 6, Synthesis and Modeling of Greenhouse Gas Emissions and Carbon Storage in Agricultural and Forestry Systems to Guide Mitigation and Adaptation, S. Del Grosso, L.R. Ahuja and W.J. Parton (eds.), American Society of Agriculture, Crop Society of America and Soil Science Society of America, pp. 129-148.

Nusser, S.M. and J.J. Goebel (1997) The national resources inventory: a long-term multi-resource monitoring programme. *Environmental and Ecological Statistics* 4:181-204.

USDA-NRCS (2015) Summary Report: 2012 National Resources Inventory, Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. Available online at: http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd396218.pdf.

Land Converted to Grassland

Asner, G.P., Archer, S., Hughes, R.F., Ansley, R.J. and Wessman, C.A. (2003) "Net changes in regional woody vegetation cover and carbon storage in Texas drylands, 1937–1999." *Global Change Biology* 9(3): 316-335.

Birdsey, R. (1996) "Carbon Storage for Major Forest Types and Regions in the Conterminous United States." In R.N. Sampson and D. Hair, (eds.). Forest and Global Change, Volume 2: Forest Management Opportunities for Mitigating Carbon Emissions. American Forests. Washington, D.C., 1-26 and 261-379 (appendices 262 and 263).

Breshears, D.D., Knapp, A.K., Law, D.J., Smith, M.D., Twidwell, D. and Wonkka, C.L., 2016. Rangeland Responses to Predicted Increases in Drought Extremity. Rangelands, 38(4), pp.191-196.

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Del Grosso, S.J., S.M. Ogle, W.J. Parton. (2011) Soil organic matter cycling and greenhouse gas accounting methodologies, Chapter 1, pp 3-13 DOI: 10.1021/bk-2011-1072.ch001. In: Understanding Greenhouse Gas Emissions from Agricultural Management (L. Guo, A. Gunasekara, L. McConnell. Eds.), American Chemical Society, Washington, D.C.

Del Grosso, S.J., W.J. Parton, A.R. Mosier, M.D. Hartman, J. Brenner, D.S. Ojima, and D.S. Schimel (2001) "Simulated Interaction of Carbon Dynamics and Nitrogen Trace Gas Fluxes Using the DAYCENT Model." In Modeling Carbon and Nitrogen Dynamics for Soil Management (Schaffer, M., L. Ma, S. Hansen, (eds.). CRC Press, Boca Raton, Florida, pp. 303-332.

Domke, G.M., J.E. Smith, and C.W. Woodall. (2011) Accounting for density reduction and structural loss in standing dead trees: Implications for forest biomass and carbon stock estimates in the United States. Carbon Balance and Management. 6:14.

Domke, G.M., et al. (2013) From models to measurements: comparing down dead wood carbon stock estimates in the U.S. forest inventory. PLoS ONE 8(3): e59949.

Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., and Smith, J.E. (2016) A framework for estimating litter carbon stocks in forests of the United States. Science of the Total Environment 557-558: 469-478.

Epstein, H.E., Gill, R.A., Paruelo, J.M., Lauenroth, W.K., Jia, G.J. and Burke, I.C. (2002) The relative abundance of three plant functional types in temperate grasslands and shrublands of North and South America: effects of projected climate change. Journal of Biogeography, 29(7), pp.875-888.

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and Wickham, J. (2011) Completion of the 2006 National Land Cover Database for the Conterminous United States, PE&RS, Vol. 77(9):858-864.

Harmon, M.E., C.W. Woodall, B. Fasth, J. Sexton, M. Yatkov. (2011) Differences between standing and downed dead tree wood density reduction factors: A comparison across decay classes and tree species. Res. Paper. NRS-15. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 40 p.

Homer, C., Dewitz, J., Fry, J., Coan, M., Hossain, N., Larson, C., Herold, N., McKerrow, A., VanDriel, J.N., and Wickham, J. (2007) Completion of the 2001 National Land Cover Database for the Conterminous United States. Photogrammetric Engineering and Remote Sensing, Vol. 73, No. 4, pp 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information. Photogrammetric Engineering and Remote Sensing, v. 81, no. 5, p. 345-354.

Houghton, R.A., et al. (1983) "Changes in the carbon content of terrestrial biota and soils between 1860 and 1980: a net release of CO₂ to the atmosphere." *Ecological Monographs* 53: 235-262.

Houghton, R. A. and Nassikas, A. A. (2017) "Global and regional fluxes of carbon from land use and land cover change 1850–2015." Global Biogeochemical Cycles 31(3): 456-472.

Huang, C.Y., Asner, G.P., Martin, R.E., Barger, N.N. and Neff, J.C. (2009) "Multiscale analysis of tree cover and aboveground carbon stocks in pinyon-juniper woodlands." Ecological Applications 19(3): 668-681.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change, [H.S. Eggleston, L. Buendia, K. Miwa, T Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Jenkins, J.C., D.C. Chojnacky, L.S. Heath, and R.A. Birdsey (2003) "National-scale biomass estimators for United States tree species." Forest Science 49(1):12-35.

Jurena, P.N. and Archer, S., (2003) Woody plant establishment and spatial heterogeneity in grasslands. Ecology, 84(4), pp.907-919.

Lenihan, J.M., Drapek, R., Bachelet, D. and Neilson, R.P., (2003) Climate change effects on vegetation distribution, carbon, and fire in California. Ecological Applications, 13(6), pp.1667-1681.

Metherell, A.K., L.A. Harding, C.V. Cole, and W.J. Parton (1993) "CENTURY Soil Organic Matter Model Environment." Agroecosystem version 4.0. Technical documentation, GPSR Tech. Report No. 4, USDA/ARS, Ft. Collins, CO.

Ogle, S.M., F.J. Breidt, M. Easter, S. Williams, K. Killian, and K. Paustian (2010) "Scale and uncertainty in modeled soil organic carbon stock changes for U.S. croplands using a process-based model." Global Change Biology 16:810-820.

Ogle, S.M., M.D. Eve, F.J. Breidt, and K. Paustian (2003) "Uncertainty in estimating land use and management impacts on soil organic carbon storage for U.S. agroecosystems between 1982 and 1997." Global Change Biology 9:1521-1542.

Parton, W.J., D.S. Ojima, C.V. Cole, and D.S. Schimel (1994) "A General Model for Soil Organic Matter Dynamics: Sensitivity to litter chemistry, texture and management," in Quantitative Modeling of Soil Forming Processes. Special Publication 39, Soil Science Society of America, Madison, WI, 147-167.

Parton, W.J., D.S. Schimel, C.V. Cole, D.S. Ojima (1987) "Analysis of factors controlling soil organic matter levels in Great Plains grasslands." *Soil Science Society of America Journal* 51:1173-1179.

Parton, W.J., J.W.B. Stewart, C.V. Cole (1988) "Dynamics of C, N, P, and S in grassland soils: a model." *Biogeochemistry* 5:109-131.

Parton, W.J., M.D. Hartman, D.S. Ojima, and D.S. Schimel (1998) "DAYCENT: Its Land Surface Submodel: Description and Testing". *Glob. Planet. Chang.* 19: 35-48.

PRISM Climate Group (2018) *PRISM Climate Data*, Oregon State University, http://prism.oregonstate.edu, downloaded 18 July 2018.

Scholes, R.J. and Archer, S.R. (1997) Tree-grass interactions in savannas 1. Annual review of Ecology and Systematics, 28(1), pp.517-544.

Sims, P.L., Singh, J.S. and Lauenroth, W.K. (1978) The structure and function of ten western North American grasslands: I. Abiotic and vegetational characteristics. The Journal of Ecology, pp.251-285.

Smith, J.E.; Heath, L.S.; Skog, K.E.; Birdsey, R.A. (2006) Methods for calculating forest ecosystem and harvested carbon with standard estimates for forest types of the United States. Gen. Tech. Rep. NE-343. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station. 216 p.

Tarhouni, M., et al. (2016) Measurement of the aboveground biomass of some rangeland species using a digital non-destructive technique. *Botany Letters* 163(3):281-287.

Tubiello, F. N., et al. (2015) "The Contribution of Agriculture, Forestry and other Land Use activities to Global Warming, 1990-2012." *Global Change Biology* 21:2655-2660.

United States Bureau of Land Management (BLM) (2014) *Rangeland Inventory, Monitoring, and Evaluation Reports*. Bureau of Land Management. U.S. Department of the Interior. Available online at: http://www.blm.gov/wo/st/en/prog/more/rangeland management/rangeland inventory.html.

USDA Forest Service. (2022) Forest Inventory and Analysis National Program: FIA Data Mart. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://apps.fs.usda.gov/fia/datamart/datamart.html. Accessed on 07 October 2022.

USDA-NRCS (2018) *Summary Report: 2015 National Resources Inventory*. Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

Woodall, C.W., and V.J. Monleon (2008) Sampling protocol, estimation, and analysis procedures for the down woody materials indicator of the FIA program. Gen. Tech. Rep. NRS-22. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 68 p.

Woodall, C.W., L.S. Heath, G.M. Domke, and M.C. Nichols. (2011) Methods and equations for estimating aboveground volume, biomass, and carbon for trees in the U.S. forest inventory, 2010. Gen. Tech. Rep. NRS-88. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 30 p.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) "A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies." *ISPRS Journal of Photogrammetry and Remote Sensing* 146: 108-123.

Wetlands Remaining Wetlands: CO₂, CH₄, and N₂O Emissions from Peatlands Remaining Peatlands

Apodaca, L. (2011) Email correspondence. Lori Apodaca, Peat Commodity Specialist, USGS and Emily Rowan, ICF International. November.

Apodaca, L. (2008) E-mail correspondence. Lori Apodaca, Peat Commodity Specialist, USGS and Emily Rowan, ICF International. October and November.

Cleary, J., N. Roulet and T.R. Moore (2005) "Greenhouse gas emissions from Canadian peat extraction, 1990-2000: A life-cycle analysis." Ambio 34:456-461.

Division of Geological & Geophysical Surveys (DGGS), Alaska Department of Natural Resources (1997–2015) Alaska's Mineral Industry Report (1997–2014). Alaska Department of Natural Resources, Fairbanks, AK. Available online at http://www.dggs.dnr.state.ak.us/pubs/pubs?reqtype=minerals.

IPCC (2014) Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. R.K. Pachauri and L.A. Meyer (eds.). IPCC, Geneva, Switzerland.

IPCC (2013) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds.). Published: IPCC, Switzerland.

IPCC (2007) Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report (AR4) of the IPCC. The Intergovernmental Panel on Climate Change, R.K. Pachauri, A. Resinger (eds.). Geneva, Switzerland.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

Szumigala, D.J. (2011) Phone conversation. Dr. David Szumigala, Division of Geological and Geophysical Surveys, Alaska Department of Natural Resources and Emily Rowan, ICF International. January 18, 2011.

Szumigala, D.J. (2008) Phone conversation. Dr. David Szumigala, Division of Geological and Geophysical Surveys, Alaska Department of Natural Resources and Emily Rowan, ICF International. October 17, 2008.

USGS (1991–2018) Minerals Yearbook: Peat (1994–2018). United States Geological Survey, Reston, VA. Available online at http://minerals.usgs.gov/minerals/pubs/commodity/peat/index.html.

USGS (2022a) Minerals Yearbook: Peat (2019) Tables-only release. United States Geological Survey, Reston, VA. Available online at https://www.usgs.gov/centers/nmic/peat-statistics-and-information.

USGS (2022b) Minerals Yearbook: Peat (2020) Tables-only release. United States Geological Survey, Reston, VA. Available online at https://www.usgs.gov/centers/nmic/peat-statistics-and-information.

USGS (2022c) Mineral Commodity Summaries: Peat (1996-2021). United States Geological Survey, Reston, VA. Available online at https://www.usgs.gov/centers/nmic/peat-statistics-and-information.

Wetlands Remaining Coastal Wetlands: Emissions and Removals from Coastal Wetlands Remaining Coastal Wetlands

Bianchi, T. S., Allison, M. A., Zhao, J., Li, X., Comeaux, R. S., Feagin, R. A., & Kulawardhana, R. W. (2013) Historical

reconstruction of mangrove expansion in the Gulf of Mexico: linking climate change with carbon sequestration in coastal wetlands. Estuarine, Coastal and Shelf Science 119: 7-16.

Byrd, K. B., Ballanti, L. R., Thomas, N. M., Nguyen, D. K., Holmquist, J. R., Simard, M., Windham-Myers, L., Schile, L. M., Parker, V. T., ... and Castaneda-Moya, E. (2017) Biomass/Remote Sensing dataset: 30m resolution tidal marsh biomass samples and remote sensing data for six regions in the conterminous United States: U.S. Geological Survey data release, https://doi.org/10.5066/F77943K8.

Byrd, K. B., Ballanti, L., Thomas, N., Nguyen, D., Holmquist, J.R., Simard, M., and Windham-Myers, L. (2018) A remote sensing-based model of tidal marsh aboveground carbon stocks for the conterminous United States. ISPRS Journal of Photogrammetry and Remote Sensing 139: 255-271.

Byrd, K. B., Ballanti, L., Thomas, N., Nguyen, D., Holmquist, J.R., Simard, M., and Windham-Myers, L. (2020) Corrigendum to "A remote sensing-based model of tidal marsh aboveground carbon stocks for the conterminous United States". ISPRS Journal of Photogrammetry and Remote Sensing 166: 63-67.

Callaway, J. C., Borgnis, E. L., Turner, R. E. & Milan, C. S. (2012a) Carbon sequestration and sediment accretion in San Francisco Bay tidal wetlands. Estuaries and Coasts 35(5): 1163-1181.

Callaway, J. C., Borgnis, E. L., Turner, R. E., Milan, C. S., Goodfriend, W., & Richmond, S. (2012b) "Wetland Sediment Accumulation at Corte Madera Marsh and Muzzi Marsh". San Francisco Bay Conservation and Development Commission.

Church, T. M., Sommerfield, C. K., Velinsky, D. J., Point, D., Benoit, C., Amouroux, D. & Donard, O. F. X. (2006) Marsh sediments as records of sedimentation, eutrophication and metal pollution in the urban Delaware Estuary. Marine Chemistry 102(1-2): 72-95.

Couvillion, B. R., Barras, J. A., Steyer, G. D., Sleavin, W., Fischer, M., Beck, H., & Heckman, D. (2011) Land area change in coastal Louisiana (1932 to 2010) (pp. 1-12). U.S. Department of the Interior, U.S. Geological Survey.

Couvillion, B. R., Fischer, M. R., Beck, H. J. and Sleavin, W. J. (2016) Spatial Configuration Trends in Coastal Louisiana from 1986 to 2010. Wetlands 1-13.

Craft, C. B., & Richardson, C. J. (1998) Recent and long-term organic soil accretion and nutrient accumulation in the Everglades. Soil Science Society of America Journal 62(3): 834-843.

Crooks, S., Findsen, J., Igusky, K., Orr, M. K. and Brew, D. (2009) Greenhouse Gas Mitigation Typology Issues Paper: Tidal Wetlands Restoration. Report by PWA and SAIC to the California Climate Action Reserve.

Crooks, S., Rybczyk, J., O'Connell, K., Devier, D. L., Poppe, K., Emmett-Mattox, S. (2014) Coastal Blue Carbon Opportunity Assessment for the Snohomish Estuary: The Climate Benefits of Estuary Restoration. Report by Environmental Science Associates, Western Washington University, EarthCorps, and Restore America's Estuaries.

DeLaune, R. D., & White, J. R. (2012) Will coastal wetlands continue to sequester carbon in response to an increase in global sea level?: A case study of the rapidly subsiding Mississippi river deltaic plain. Climatic Change, 110(1), 297-314.

Holmquist, J. R., Windham-Myers, L., Bliss, N., Crooks, S., Morris, J. T., Megonigal, J. P. & Woodrey, M. (2018) Accuracy and Precision of Tidal Wetland Soil Carbon Mapping in the Conterminous United States. Scientific reports 8(1): 9478.

Hu, Z., Lee, J. W., Chandran, K., Kim, S. and Khanal, S. K. (2012) N₂O Emissions from Aquaculture: A Review. Environmental Science & Technology 46(12): 6470-6480.

Hussein, A. H., Rabenhorst, M. C. & Tucker, M. L. (2004) Modeling of carbon sequestration in coastal marsh soils. Soil Science Society of America Journal 68(5): 1786-1795.

IPCC (2000) Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories.

Quantifying Uncertainties in Practice, Chapter 6. Penman, J., Kruger, D., Galbally, I., Hiraishi, T., Nyenzi, B.,
Emmanuel, S., Buendia, L., Hoppaus, R., Martinsen, T., Meijer, J., Miwa, K. and Tanabe, K. (eds). Institute of Global

Environmental Strategies (IGES), on behalf of the Intergovernmental Panel on Climate Change (IPCC): Hayama, Japan.

IPCC (2003) Good Practice Guidance for Land Use, Land-Use Change and Forestry. LUCF Sector Good Practice Guidance, Chapter 3. Penman, J., Gytarsky, M., Hiraishi, T., Krug, T., Kruger, D., Pipatti, R., Buendia, L., Miwa, K., Ngara, T., Tanabe, K. and Wagner, F. (eds). Institute of Global Environmental Strategies (IGES), on behalf of the Intergovernmental Panel on Climate Change (IPCC): Hayama, Japan.

IPCC (2006) IPCC Guidelines for National Greenhouse Gas Inventories. Prepared by the National Greenhouse Gas Inventories Programme, Eggleston H.S., Buendia L., Miwa K., Ngara T. and Tanabe K. (eds). IGES, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Stocker, T., Qin, D., Plattner, G.-K., Tignor, M. Allen, S.K., Boschung, J., Nauels, A., Xia, Y., Bex, V. and Midgley, P.M. (eds.). Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

IPCC (2014) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds.). Published: IPCC, Switzerland.

Kearney, M. S. & Stevenson, J. C. (1991) Island land loss and marsh vertical accretion rate evidence for historical sea-level changes in Chesapeake Bay. Journal of Coastal Research 7(2): 403-415.

Köster, D., Lichter, J., Lea, P. D., & Nurse, A. (2007) Historical eutrophication in a river-estuary complex in midcoast Maine. Ecological Applications 17(3): 765-778.

Lu, M & Megonigal, J. P. (2017) Final Report for RAE Baseline Assessment Project. Memo to Silvestrum Climate Associates by Smithsonian Environmental Research Center, Maryland.

Lynch, J. C. (1989) Sedimentation and nutrient accumulation in mangrove ecosystems of the Gulf of Mexico. M.S. thesis, Univ. of Southwestern Louisiana, Lafayette, LA.

Marchio, D. A., Savarese, M., Bovard, B., & Mitsch, W. J. (2016) Carbon sequestration and sedimentation in mangrove swamps influenced by hydrogeomorphic conditions and urbanization in Southwest Florida. Forests 7: 116-135.

McCombs, J. W., Herold, N. D., Burkhalter, S. G. and Robinson C. J. (2016) Accuracy Assessment of NOAA Coastal Change Analysis Program 2006-2010 Land Cover and Land Cover Change Data. Photogrammetric Engineering & Remote Sensing. 82:711-718.

Merrill, J. Z. (1999) Tidal Freshwater Marshes as Nutrient Sinks: particulate Nutrient Burial and Denitrification. Ph.D. Dissertation, University of Maryland, College Park, MD, 342 pp.

National Marine Fisheries Service (2022). Fisheries of the United States, 2020. U.S. Department of Commerce, NOAA Current Fishery Statistics No. 2020. Available at: https://www.fisheries.noaa.gov/ national/sustainablefisheries/fisheries-united-states

National Oceanic and Atmospheric Administration, Office for Coastal Management (2020) Coastal Change Analysis Program (C-CAP) Regional Land Cover. Charleston, SC: NOAA Office for Coastal Management. Accessed October 2020 at <www.coast.noaa.gov/htdata/raster1/landcover/bulkdownload/30m_lc/>.

Noe, G. B., Hupp, C. R., Bernhardt, C. E., & Krauss, K. W. (2016) Contemporary deposition and long-term accumulation of sediment and nutrients by tidal freshwater forested wetlands impacted by sea level rise. Estuaries and Coasts 39(4): 1006-1019.

Orson, R. A., Simpson, R. L., & Good, R. E. (1990) Rates of sediment accumulation in a tidal freshwater marsh. Journal of Sedimentary Research 60(6): 859-869.

Orson, R., Warren, R. & Niering, W. (1998) Interpreting sea level rise and rates of vertical marsh accretion in a southern New England tidal salt marsh. Estuarine, Coastal and Shelf Science 47(4): 419-429.

Roman, C., Peck, J., Allen, J., King, J. & Appleby, P. (1997) Accretion of a New England (USA) salt marsh in response to inlet migration, storms, and sea-level rise. Estuarine, Coastal and Shelf Science 45(6): 717-727.

Villa, J. A. & Mitsch W. J. (2015) Carbon sequestration in different wetland plant communities of Southwest Florida. International Journal for Biodiversity Science, Ecosystems Services and Management 11: 17-28

Weston, N. B., Neubauer, S. C., Velinsky, D. J., & Vile, M. A. (2014) Net ecosystem carbon exchange and the greenhouse gas balance of tidal marshes along an estuarine salinity gradient. Biogeochemistry 120: 163-189.

Wetlands Remaining Wetlands: Flooded Land Remaining Flooded Land

Abril, G., Gu'erin, F., Richard, S., Delmas, R., Galy-Lacaux, C., Gosse, P., et al., 2005. Carbon dioxide and methane emissions and the carbon budget of a 10-year old tropical reservoir (Petit Saut, French Guiana). Global Biogeochem. Cycles 19 (GB4007), 1–16. https://doi.org/10.1029/2005GB002457.

Barros, N., Cole, J.J., Tranvik, L.J., Prairie, Y.T., Bastviken, D., Huszar, V.L.M., et al., 2011. Carbon emission from hydroelectric reservoirs linked to reservoir age and latitude. Nat. Geosci. 4 (9), 593–596. https://doi.org/10.1038/ngeo1211.

Davis, D. W. (1973) Louisiana Canals and Their Influence on Wetland Development. Louisiana State University and Agricultural & Mechanical College. LSU Historical Dissertations and Theses. 2386., Louisiana State University.

IPCC (2003) *Good Practice Guidance for Land Use, Land-Use Change and Forestry.* LUCF Sector Good Practice Guidance, Chapter 3. Penman, J., Gytarsky, M., Hiraishi, T., Krug, T., Kruger, D., Pipatti, R., Buendia, L., Miwa, K., Ngara, T., Tanabe, K. and Wagner, F. (eds). Institute of Global Environmental Strategies (IGES), on behalf of the Intergovernmental Panel on Climate Change (IPCC): Hayama, Japan.

IPCC (2006) *IPCC Guidelines for National Greenhouse Gas Inventories*. Prepared by the National Greenhouse Gas Inventories Programme, Eggleston H.S., Buendia L., Miwa K., Ngara T. and Tanabe K. (eds). IGES, Japan.

IPCC. (2013) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds). In: IPCC, Switzerland.

IPCC (2019) 2019 Refinement to the 2006 Guidelines for National Greenhouse Gas Inventories. Wetlands, Chapter 7. Lovelock, C. E., Evans, C., Barros, N., Prairie, Y. T., Alm, J., Bastviken, D., Beaulieu, J. J., Garneau, M., Harby, A., Harrison, J. A., Pare, David, Raadal, Hanne Lerche, Sherman, B., Zhang, Chengyi, Ogle, S. M.

Lehner B, Reidy Liermann C, Revenga C, Vorosmarty C, Fekete B, Crouzet P, Doll P, et al. (2011b) Global Reservoir and Dam Database, Version 1 (GRanDv1): Dams, Revision 01. In: Palisades, NY: NASA Socioeconomic Data and Applications Center (SEDAC).

Prairie, Y. T., et al. (2017) The GHG Reservoir Tool (G-res) User guide. UNESCO/IHA research project on the GHG status of freshwater reservoirs. Joint publication of the UNESCO Chair in Global Environmental Change and the International Hydropower Association: 38.

Teodoru, C.R., Bastien, J., Bonneville, M.C., Del Giorgio, P.a., Demarty, M., Garneau, M., et al., 2012. The net carbon footprint of a newly created boreal hydroelectric reservoir. Global Biogeochem. Cycles 26 (GB2016), 1–14. https://doi.org/10.1029/ 2011GB004187.

Land Converted to Wetlands: Emissions and Removals from Land Converted to Vegetated Coastal Wetlands

Bianchi, T. S., Allison, M. A., Zhao, J., Li, X., Comeaux, R. S., Feagin, R. A., & Kulawardhana, R. W. (2013) Historical

reconstruction of mangrove expansion in the Gulf of Mexico: linking climate change with carbon sequestration in coastal wetlands. Estuarine, Coastal and Shelf Science 119: 7-16.

Byrd, K. B., Ballanti, L. R., Thomas, N. M., Nguyen, D. K., Holmquist, J. R., Simard, M., Windham-Myers, L., Schile, L. M., Parker, V. T., ... and Castaneda-Moya, E. (2017) Biomass/Remote Sensing dataset: 30m resolution tidal marsh biomass samples and remote sensing data for six regions in the conterminous United States: U.S. Geological Survey data release, https://doi.org/10.5066/F77943K8.

Byrd, K. B., Ballanti, L., Thomas, N., Nguyen, D., Holmquist, J.R., Simard, M., and Windham-Myers, L. (2018) A remote sensing-based model of tidal marsh aboveground carbon stocks for the conterminous United States. ISPRS Journal of Photogrammetry and Remote Sensing 139: 255-271.

Byrd, K. B., Ballanti, L., Thomas, N., Nguyen, D., Holmquist, J.R., Simard, M., and Windham-Myers, L. (2020) Corrigendum to "A remote sensing-based model of tidal marsh aboveground carbon stocks for the conterminous United States". ISPRS Journal of Photogrammetry and Remote Sensing 166: 63-67.

Callaway, J. C., Borgnis, E. L., Turner, R. E. & Milan, C. S. (2012a) Carbon sequestration and sediment accretion in San Francisco Bay tidal wetlands. Estuaries and Coasts 35(5): 1163-1181.

Callaway, J. C., Borgnis, E. L., Turner, R. E., Milan, C. S., Goodfriend, W., & Richmond, S. (2012b) "Wetland Sediment Accumulation at Corte Madera Marsh and Muzzi Marsh". San Francisco Bay Conservation and Development Commission.

Church, T. M., Sommerfield, C. K., Velinsky, D. J., Point, D., Benoit, C., Amouroux, D. & Donard, O. F. X. (2006) Marsh sediments as records of sedimentation, eutrophication and metal pollution in the urban Delaware Estuary. Marine Chemistry 102(1-2): 72-95.

Craft, C. B., & Richardson, C. J. (1998) Recent and long-term organic soil accretion and nutrient accumulation in the Everglades. Soil Science Society of America Journal 62(3): 834-843.

Crooks, S., Rybczyk, J., O'Connell, K., Devier, D.L., Poppe, K., Emmett-Mattox, S. (2014) Coastal Blue Carbon Opportunity Assessment for the Snohomish Estuary: The Climate Benefits of Estuary Restoration. Report by Environmental Science Associates, Western Washington University, EarthCorps, and Restore America's Estuaries.

Hussein, A. H., Rabenhorst, M. C. & Tucker, M. L. (2004) Modeling of carbon sequestration in coastal marsh soils. Soil Science Society of America Journal 68(5): 1786-1795.

IPCC (2019) Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 4: Agriculture, Forestry, and Other Land Use. Calvo Buendia, E., Tanabe K., Kranjc, A., Baasansuren, J., Fukuda, M., Ngarize, S., Osako, A., Pyrozhenko, Y., Shermanau, P., & Federici, S. (eds). IPCC, Switzerland.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Prepared by the National Greenhouse Gas Inventories Programme, H.S.Eggleston, L. Buendia, K. Miwa, T. Ngara & K. Tanabe (eds). IGES, Japan.

IPCC (2014) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds.). Published: IPCC, Switzerland.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Stocker, T., Qin, D., Plattner, G.-K., Tignor, M. Allen, S.K., Boschung, J., Nauels, A., Xia, Y., Bex, V. and Midgley, P.M. (eds.). Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

IPCC (2003) Good Practice Guidance for Land Use, Land-Use Change and Forestry. LUCF Sector Good Practice Guidance, Chapter 3. Penman, J., Gytarsky, M., Hiraishi, T., Krug, T., Kruger, D., Pipatti, R., Buendia, L., Miwa, K., Ngara, T., Tanabe, K. & F. Wagner (eds). Institute of Global Environmental Strategies (IGES), on behalf of the Intergovernmental Panel on Climate Change (IPCC): Hayama, Japan.

IPCC (2000) Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories.

Quantifying Uncertainties in Practice, Chapter 6. Penman, J and Kruger, D and Galbally, I and Hiraishi, T and Nyenzi, B and Emmanuel, S and Buendia, L and Hoppaus, R and Martinsen, T and Meijer, J and Miwa, K and Tanabe, K (eds). Institute of Global Environmental Strategies (IGES), on behalf of the Intergovernmental Panel on Climate Change (IPCC): Hayama, Japan.

Kearney, M. S. & Stevenson, J. C. (1991) Island land loss and marsh vertical accretion rate evidence for historical sea-level changes in Chesapeake Bay. Journal of Coastal Research 7(2): 403-415.

Köster, D., Lichter, J., Lea, P. D., & Nurse, A. (2007) Historical eutrophication in a river–estuary complex in mid-coast Maine. Ecological Applications 17(3): 765-778.

Lu, M & Megonigal, J.P. (2017) Final Report for RAE Baseline Assessment Project. Memo to Silvestrum Climate Associates by Smithsonian Environmental Research Center, Maryland.

Lynch, J. C., Sedimentation and nutrient accumulation in mangrove ecosystems of the Gulf of Mexico, M.S. thesis, Univ. of Southwestern Louisiana, Lafayette, La., 1989.

Marchio, D.A., Savarese, M., Bovard, B., & Mitsch, W.J. (2016) Carbon sequestration and sedimentation in mangrove swamps influenced by hydrogeomorphic conditions and urbanization in Southwest Florida. Forests 7: 116-135.

McCombs, J.W., Herold, N.D., Burkhalter, S.G. and Robinson C.J., (2016) Accuracy Assessment of NOAA Coastal Change Analysis Program 2006-2010 Land Cover and Land Cover Change Data. Photogrammetric Engineering & Remote Sensing. 82:711-718.

Merrill, J. Z. (1999) Tidal Freshwater Marshes as Nutrient Sinks: particulate Nutrient Burial and Denitrification. Ph.D. Dissertation, University of Maryland, College Park, MD, 342pp.

National Oceanic and Atmospheric Administration, Office for Coastal Management (2020) Coastal Change Analysis Program (C-CAP) Regional Land Cover. Charleston, SC: NOAA Office for Coastal Management. Accessed October 2020 at <www.coast.noaa.gov/htdata/raster1/landcover/bulkdownload/30m_lc/>.

Noe, G. B., Hupp, C. R., Bernhardt, C. E., & Krauss, K. W. (2016) Contemporary deposition and long-term accumulation of sediment and nutrients by tidal freshwater forested wetlands impacted by sea level rise. Estuaries and Coasts 39(4): 1006-1019.

Orson, R. A., Simpson, R. L., & Good, R. E. (1990) Rates of sediment accumulation in a tidal freshwater marsh. Journal of Sedimentary Research 60(6): 859-869.

Orson, R., Warren, R. & Niering, W. (1998) Interpreting sea level rise and rates of vertical marsh accretion in a southern New England tidal salt marsh. Estuarine, Coastal and Shelf Science 47(4): 419-429.

Roman, C., Peck, J., Allen, J., King, J. & Appleby, P. (1997) Accretion of a New England (USA) salt marsh in response to inlet migration, storms, and sea-level rise. Estuarine, Coastal and Shelf Science 45(6): 717-727.

Villa, J. A. & Mitsch W. J. (2015) "Carbon sequestration in different wetland plant communities of Southwest Florida". International Journal for Biodiversity Science, Ecosystems Services and Management 11: 17-28.

Weston, N. B., Neubauer, S. C., Velinsky, D. J., & Vile, M. A. (2014) Net ecosystem carbon exchange and the greenhouse gas balance of tidal marshes along an estuarine salinity gradient. Biogeochemistry 120: 163-189.

Land Converted to Wetlands: Land Converted to Flooded Land

Abril, G., Gu'erin, F., Richard, S., Delmas, R., Galy-Lacaux, C., Gosse, P., et al., 2005. Carbon dioxide and methane emissions and the carbon budget of a 10-year old tropical reservoir (Petit Saut, French Guiana). Global Biogeochem. Cycles 19 (GB4007), 1–16. https://doi.org/10.1029/2005GB002457.

Barros, N., Cole, J.J., Tranvik, L.J., Prairie, Y.T., Bastviken, D., Huszar, V.L.M., et al., 2011. Carbon emission from hydroelectric reservoirs linked to reservoir age and latitude. Nat. Geosci. 4 (9), 593-596. https://doi.org/10.1038/ngeo1211.

IPCC (2003) Good Practice Guidance for Land Use, Land-Use Change and Forestry. LUCF Sector Good Practice Guidance, Chapter 3. Penman, J., Gytarsky, M., Hiraishi, T., Krug, T., Kruger, D., Pipatti, R., Buendia, L., Miwa, K., Ngara, T., Tanabe, K. and Wagner, F. (eds). Institute of Global Environmental Strategies (IGES), on behalf of the Intergovernmental Panel on Climate Change (IPCC): Hayama, Japan.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Prepared by the National Greenhouse Gas Inventories Programme, H.S.Eggleston, L. Buendia, K. Miwa, T. Ngara & K. Tanabe (eds). IGES, Japan.

IPCC. (2013) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds). In: IPCC, Switzerland.

IPCC (2019) 2019 Refinement to the 2006 Guidelines for National Greenhouse Gas Inventories. Wetlands, Chapter 7. Lovelock, C. E., Evans, C., Barros, N., Prairie, Y. T., Alm, J., Bastviken, D., Beaulieu, J. J., Garneau, M., Harby, A., Harrison, J. A., Pare, David, Raadal, Hanne Lerche, Sherman, B., Zhang, Chengyi, Ogle, S. M.

Lehner B, Reidy Liermann C, Revenga C, Vorosmarty C, Fekete B, Crouzet P, Doll P, et al. (2011b) Global Reservoir and Dam Database, Version 1 (GRanDv1): Dams, Revision 01. In: Palisades, NY: NASA Socioeconomic Data and Applications Center (SEDAC).

Prairie, Y. T., et al. (2017) The GHG Reservoir Tool (G-res) User guide. UNESCO/IHA research project on the GHG status of freshwater reservoirs. Joint publication of the UNESCO Chair in Global Environmental Change and the International Hydropower Association: 38.

Teodoru, C.R., Bastien, J., Bonneville, M.C., Del Giorgio, P.a., Demarty, M., Garneau, M., et al., 2012. The net carbon footprint of a newly created boreal hydroelectric reservoir. Global Biogeochem. Cycles 26 (GB2016), 1–14. https://doi.org/10.1029/2011GB004187.

Settlements Remaining Settlements: Soil Carbon Stock Changes

AAPFCO (2016 through 2022) Commercial Fertilizers: 2013-2017. Association of American Plant Food Control Officials. University of Missouri. Columbia, MO.

Armentano, T. V., and E.S. Menges (1986) Patterns of change in the carbon balance of organic soil-wetlands of the temperate zone. Journal of Ecology 74: 755-774.

Brady, N.C. and R.R. Weil (1999) The Nature and Properties of Soils. Prentice Hall. Upper Saddle River, NJ, 881.

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and J. Wickham. (2011) Completion of the 2006 National Land Cover Database for the Conterminous United States, PE&RS 77(9):858-864.

Homer, C., J. Dewitz, J. Fry, M. Coan, N. Hossain, C. Larson, N. Herold, A. McKerrow, J.N. VanDriel and J. Wickham. (2007) Completion of the 2001 National Land Cover Database for the Conterminous United States. Photogrammetric Engineering and Remote Sensing 73(4): 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information. Photogrammetric Engineering and Remote Sensing 81(5):345-354.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

NRCS (1999) Soil Taxonomy: A basic system of soil classification for making and interpreting soil surveys, 2nd Edition. Agricultural Handbook Number 436, Natural Resources Conservation Service, U.S. Department of Agriculture, Washington, D.C.

Nusser, S.M. and J.J. Goebel (1997) The national resources inventory: a long-term multi-resource monitoring programme. Environmental and Ecological Statistics 4:181-204.

Ogle, S.M., M.D. Eve, F.J. Breidt, and K. Paustian (2003) Uncertainty in estimating land use and management impacts on soil organic carbon storage for U.S. agroecosystems between 1982 and 1997. Global Change Biology 9:1521-1542.

Soil Survey Staff (2011) State Soil Geographic (STATSGO) Database for State. Natural Resources Conservation Service, United States Department of Agriculture. Available online at: http://www.ncgc.nrcs.usda.gov/products/datasets/statsgo/index.html.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory, Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies. ISPRS Journal of Photogrammetry and Remote Sensing 146: 108-123.

Settlements Remaining Settlements: Changes in Carbon Stocks in Settlement Trees

deVries, R.E. (1987) A Preliminary Investigation of the Growth and Longevity of Trees in Central Park. M.S. thesis, Rutgers University, New Brunswick, NJ.

Fleming, L.E. (1988) Growth Estimation of Street Trees in Central New Jersey. M.S. thesis, Rutgers University, New Brunswick, NJ.

Frelich, L.E. (1992) Predicting Dimensional Relationships for Twin Cities Shade Trees. University of Minnesota, Department of Forest Resources, St. Paul, MN, p. 33.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

MRLC (2013) National Land Cover Database 2001 (NLCD2001). Available online at: http://www.mrlc.gov/nlcd2001.php. Accessed August 2013.

Nowak, D.J. (1986) Silvics of an Urban Tree Species: Norway maple (Acer platanoides L.). M.S. thesis, College of Environmental Science and Forestry, State University of New York, Syracuse, NY.

Nowak, D.J. (1994) Atmospheric carbon dioxide reduction by Chicago's urban forest. In: Chicago's Urban Forest Ecosystem: Results of the Chicago Urban Forest Climate Project. E.G. McPherson, D.J. Nowak, and R.A. Rowntree (eds.). General Technical Report NE-186. U.S. Department of Agriculture Forest Service, Radnor, PA. pp. 83–94.

Nowak, D.J. (2012) Contrasting natural regeneration and tree planting in 14 North American cities. Urban Forestry and Urban Greening. 11: 374–382.

Nowak, D.J. and D.E. Crane (2002) Carbon storage and sequestration by urban trees in the United States. Environmental Pollution 116(3):381-389.

Nowak, D.J. and E. Greenfield (2010) Evaluating the National Land Cover Database tree canopy and impervious cover estimates across the conterminous United States: A comparison with photo-interpreted estimates. Environmental Management. 46: 378-390.

Nowak, D.J. and E.J. Greenfield (2018a) U.S. urban forest statistics, values and projections. Journal of Forestry. 116(2):164–177

Nowak, D.J. and E.J. Greenfield (2018b) Declining urban and community tree cover in the United States. Urban Forestry and Urban Greening. 32:32-55.

Nowak, D.J., D.E. Crane, J.C. Stevens, and M. Ibarra (2002) Brooklyn's Urban Forest. General Technical Report NE-290. U.S. Department of Agriculture Forest Service, Newtown Square, PA.

Nowak, D.J., R.E. Hoehn, D.E. Crane, J.C. Stevens, J.T. Walton, and J. Bond (2008) A ground-based method of assessing urban forest structure and ecosystem services. Arboric. Urb. For. 34(6): 347-358.

Nowak, D.J., E.J. Greenfield, R.E. Hoehn, and E. Lapoint (2013) Carbon storage and sequestration by trees in urban and community areas of the United States." Environmental Pollution 178: 229-236.

Nowak, D.J. A.R. Bodine, R.E. Hoehn, C.B. Edgar, D.R. Hartel, T.W. Lister, T.J. Brandeis (2016) Austin's Urban Forest, 2014. USDA Forest Service, Northern Research Station Resources Bulletin. NRS-100. Newtown Square, PA. 55 p.

Nowak, D.J. A.R. Bodine, R.E. Hoehn, C.B. Edgar, G. Riley, D.R. Hartel, K.J. Dooley, S.M. Stanton, M.A. Hatfield, T.J. Brandeis, T.W. Lister (2017) Houston's Urban Forest, 2015. USDA Forest Service, Southern Research Station Resources Bulletin. SRS-211. Newtown Square, PA. 91 p.

Smith, W.B. and S.R. Shifley (1984) Diameter Growth, Survival, and Volume Estimates for Trees in Indiana and Illinois. Research Paper NC-257. North Central Forest Experiment Station, U.S. Department of Agriculture Forest Service, St. Paul, MN.

U.S. Department of Interior (2018) National Land Cover Database 2011 (NLCD2011). Accessed online August 16, 2018. Available online at: https://www.mrlc.gov/nlcd11 leg.php.

Settlements Remaining Settlements: N₂O Emissions from Soils

Brakebill, J.W. and Gronberg, J.M. (2017) County-Level Estimates of Nitrogen and Phosphorus from Commercial Fertilizer for the Conterminous United States, 1987-2012. U.S. Geological Survey, https://doi.org/10.5066/F7H41PKX.

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

Soil Survey Staff (2016) State Soil Geographic (STATSGO) Database for State. Natural Resources Conservation Service, United States Department of Agriculture. Available online at: http://www.ncgc.nrcs.usda.gov/products/datasets/statsgo/index.html.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory, Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

Settlements Remaining Settlements: Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills

Barlaz, M.A. (2008) "Re: Corrections to Previously Published Carbon Storage Factors." Memorandum to Randall Freed, ICF International. February 28, 2008.

Barlaz, M.A. (2005) "Decomposition of Leaves in Simulated Landfill." Letter report to Randall Freed, ICF Consulting. June 29, 2005.

Barlaz, M.A. (1998) "Carbon Storage during Biodegradation of Municipal Solid Waste Components in Laboratory-Scale Landfills." *Global Biogeochemical Cycles* 12:373–380.

De la Cruz, F.B. and M.A. Barlaz (2010) "Estimation of Waste Component Specific Landfill Decay Rates Using Laboratory-Scale Decomposition Data" *Environmental Science & Technology* 44:4722–4728.

Eleazer, W.E., W.S. Odle, Y. Wang, and M.A. Barlaz (1997) "Biodegradability of Municipal Solid Waste Components in Laboratory-Scale Landfills." *Environmental Science & Technology* 31:911–917.

EPA (2020) Advancing Sustainable Materials Management: Facts and Figures 2018. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C. Available online at https://www.epa.gov/smm/advancing-sustainable-materials-management-facts-and-figures-report.

EPA (2019) Advancing Sustainable Materials Management: Facts and Figures. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C. Available online at https://www.epa.gov/smm/advancing-sustainable-materials-management-facts-and-figures-report.

EPA (2016) Municipal Solid Waste Generation, Recycling, and Disposal in the United States: Facts and Figures. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C. Available online at https://archive.epa.gov/epawaste/nonhaz/municipal/web/html/msw99.html.

EPA (1995) Compilation of Air Pollutant Emission Factors. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, NC. AP-42 Fifth Edition. Available online at http://www3.epa.gov/ttnchie1/ap42/.

EPA (1991) *Characterization of Municipal Solid Waste in the United States: 1990 Update*. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C. EPA/530-SW-90-042.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

IPCC (2003) Good Practice Guidance for Land Use, Land-Use Change, and Forestry. The Intergovernmental Panel on Climate Change, National Greenhouse Gas Inventories Programme, J. Penman et al. (eds.). Available online at http://www.ipcc-nggip.iges.or.jp/public/gpglulucf/gpglulucf.htm.

Oshins, C. and D. Block (2000) "Feedstock Composition at Composting Sites." Biocycle 41(9):31–34.

Tchobanoglous, G., H. Theisen, and S.A. Vigil (1993) Integrated Solid Waste Management, 1st edition. McGraw-Hill, NY. Cited by Barlaz (1998) "Carbon Storage during Biodegradation of Municipal Solid Waste Components in Laboratory-Scale Landfills." Global Biogeochemical Cycles 12:373–380.

Land Converted to Settlements

Birdsey, R. (1996) "Carbon Storage for Major Forest Types and Regions in the Conterminous United States." In R.N. Sampson and D. Hair, (eds.). Forest and Global Change, Volume 2: Forest Management Opportunities for Mitigating Carbon Emissions. American Forests. Washington, D.C., 1-26 and 261-379 (appendices 262 and 263).

Brockwell, Peter J., and Richard A. Davis (2016) Introduction to time series and forecasting. Springer. Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., and Smith, J.E. (2016) A framework for estimating litter carbon stocks in forests of the United States. Science of the Total Environment 557–558: 469–478.

Domke, G.M., J.E. Smith, and C.W. Woodall. (2011) Accounting for density reduction and structural loss in standing dead trees: Implications for forest biomass and carbon stock estimates in the United States. Carbon Balance and Management. 6:14.

Domke, G.M., Woodall, C.W., Walters, B.F., Smith, J.E. (2013) From models to measurements: comparing down dead wood carbon stock estimates in the U.S. forest inventory. PLoS ONE 8(3): e59949.

Domke, G.M., Perry, C.H., Walters, B.F., Woodall, C.W., and Smith, J.E. (2016) A framework for estimating litter carbon stocks in forests of the United States. Science of the Total Environment 557-558: 469-478.

Fry, J., Xian, G., Jin, S., Dewitz, J., Homer, C., Yang, L., Barnes, C., Herold, N., and Wickham, J. (2011) Completion of the 2006 National Land Cover Database for the Conterminous United States, PE&RS, Vol. 77(9):858-864.

Harmon, M.E., C.W. Woodall, B. Fasth, J. Sexton, M. Yatkov. (2011) Differences between standing and downed dead tree wood density reduction factors: A comparison across decay classes and tree species. Res. Paper. NRS-15. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 40 p.

Homer, C., Dewitz, J., Fry, J., Coan, M., Hossain, N., Larson, C., Herold, N., McKerrow, A., VanDriel, J.N., and Wickham, J. (2007) Completion of the 2001 National Land Cover Database for the Conterminous United States. Photogrammetric Engineering and Remote Sensing, Vol. 73, No. 4, pp 337-341.

Homer, C.G., Dewitz, J.A., Yang, L., Jin, S., Danielson, P., Xian, G., Coulston, J., Herold, N.D., Wickham, J.D., and Megown, K. (2015) Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information. Photogrammetric Engineering and Remote Sensing, v. 81, no. 5, p. 345-354.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change, H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan.

Jenkins, J.C., D.C. Chojnacky, L.S. Heath, and R.A. Birdsey (2003) "National-scale biomass estimators for United States tree species." Forest Science 49(1):12-35.

Ogle, S.M., M.D. Eve, F.J. Breidt, and K. Paustian (2003) "Uncertainty in estimating land use and management impacts on soil organic carbon storage for U.S. agroecosystems between 1982 and 1997." Global Change Biology 9:1521-1542.

Ogle, S.M., F.J. Breidt, and K. Paustian (2006) "Bias and variance in model results due to spatial scaling of measurements for parameterization in regional assessments." Global Change Biology 12:516-523.

Schimel, D.S. (1995) "Terrestrial ecosystems and the carbon cycle." Global Change Biology 1: 77-91.

Smith, J.E.; Heath, L.S.; Skog, K.E.; Birdsey, R.A. (2006) Methods for calculating forest ecosystem and harvested carbon with standard estimates for forest types of the United States. Gen. Tech. Rep. NE-343. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station. 216 p.

Tubiello, F. N., et al. (2015) "The Contribution of Agriculture, Forestry and other Land Use activities to Global Warming, 1990-2012." Global Change Biology 21:2655-2660.

USDA Forest Service. (2022) Forest Inventory and Analysis National Program: FIA Data Mart. U.S. Department of Agriculture Forest Service. Washington, D.C. Available online at: https://apps.fs.usda.gov/fia/datamart/datamart.html. Accessed on 07 October 2022.

USDA-NRCS (2018) Summary Report: 2015 National Resources Inventory, Natural Resources Conservation Service, Washington, D.C., and Center for Survey Statistics and Methodology, Iowa State University, Ames, Iowa. https://www.nrcs.usda.gov/Internet/FSE DOCUMENTS/nrcseprd1422028.pdf.

USDA-NRCS (1997) "National Soil Survey Laboratory Characterization Data," Digital Data, Natural Resources Conservation Service, U.S. Department of Agriculture. Lincoln, NE.

Woodall, C.W., L.S. Heath, G.M. Domke, and M.C. Nichols. (2011) Methods and equations for estimating aboveground volume, biomass, and carbon for trees in the U.S. forest inventory, 2010. Gen. Tech. Rep. NRS-88. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 30 p.

Woodall, C.W., and V.J. Monleon (2008) Sampling protocol, estimation, and analysis procedures for the down woody materials indicator of the FIA program. Gen. Tech. Rep. NRS-22. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 68 p.

Yang, L., Jin, S., Danielson, P., Homer, C., Gass, L., Bender, S. M., Case, A., Costello, C., Dewitz, J., Fry, J., Funk, M., Granneman, B., Liknes, G. C., Rigge, M. & Xian, G. (2018) A new generation of the United States National Land Cover Database: Requirements, research priorities, design, and implementation strategies. ISPRS Journal of Photogrammetry and Remote Sensing 146: 108-123

Waste

Landfills

40 CFR Part 60, Subpart WWW (2005) Standards of Performance for Municipal Solid Waste Landfills, 60.750-60.759, Code of Federal Regulations, Title 40. Available online at: https://www.ecfr.gov/current/title-40/chapter-l/subchapter-C/part-60/subpart-WWW.

40 CFR Part 258, Subtitle D of RCRA (2012) Criteria for Municipal Solid Waste Landfills, 258.1—258.75, Code of Federal Regulations, Title 40. Available online at: https://www.ecfr.gov/cgi-bin/text-idx?node=pt40.25.258.

ATSDR (2001). Chapter 2: Landfill Gas Basics. In Landfill Gas Primer - An Overview for Environmental Health Professionals. Figure 2-1, pp. 5-6. https://www.atsdr.cdc.gov/HAC/landfill/PDFs/Landfill_2001_ch2mod.pdf.

BioCycle (2010) "The State of Garbage in America" By L. Arsova, R. Van Haaren, N. Goldstein, S. Kaufman, and N. Themelis. *BioCycle*. December 2010. Available online at: https://www.biocycle.net/2010/10/26/the-state-of-garbage-in-america-4/.

BioCycle (2006) "The State of Garbage in America" By N. Goldstein, S. Kaufman, N. Themelis, and J. Thompson Jr. *BioCycle*. April 2006. Available online at: https://www.biocycle.net/2006/04/21/the-state-of-garbage-in-america-2/.

Bronstein, K., Coburn, J., and R. Schmeltz (2012) "Understanding the EPA's Inventory of U.S. Greenhouse Gas Emissions and Sinks and Mandatory GHG Reporting Program for Landfills: Methodologies, Uncertainties,

https://www3.epa.gov/ttnchie1/conference/ei20/session3/kbronstein.pdf.

Business for Social Responsibility (BSR) (2014). Analysis of U.S. Food Waste Among Food Manufacturers, Retailers, and Restaurants. Available online at: http://www.foodwastealliance.org/wp-content/uploads/2014/11/FWRA BSR Tier3 FINAL.pdf.

BSR (2013) Analysis of U.S. Food Waste Among Food Manufacturers, Retailers, and Restaurants. Available online at: http://www.foodwastealliance.org/wp-content/uploads/2013/06/FWRA BSR Tier2 FINAL.pdf.

Czepiel, P., B. Mosher, P. Crill, and R. Harriss (1996) "Quantifying the Effect of Oxidation on Landfill Methane Emissions." *Journal of Geophysical Research*, 101(D11):16721-16730.Dou, Z.; Ferguson, J. D.; Galligan, D. T.; Kelly, A. M.; Finn, S. T.; Giegengack, R. (2016) "Assessing U.S. food wastage and opportunities for reduction." Global Food Security Volume 8, March 2016, Pages 19-26. https://doi.org/10.1016/j.gfs.2016.02.001.

EIA (2007) Voluntary Greenhouse Gas Reports for EIA Form 1605B (Reporting Year 2006). Available online at: https://www.eia.gov/environment/pdfpages/0608s(2009)index.php.

EPA (2022a) Greenhouse Gas Reporting Program (GHGRP). 2021 Amazon S3 Data. Subpart HH: Municipal Solid Waste Landfills and Subpart TT: Industrial Waste Landfills. Accessed on August 13, 2022.

EPA (2022b) Landfill Methane Outreach Program (LMOP). 2022 Landfill and Project Level Data. August 2022. Available online at: https://www.epa.gov/lmop/landfill-gas-energy-project-data.

EPA (2020a) Wasted Food Measurement Methodology Scoping Memo. July 2020. Available online at https://www.epa.gov/sites/production/files/2020-

06/documents/food measurement methodology scoping memo-6-18-20.pdf.

EPA (2020b) Advancing Sustainable Materials Management: Facts and Figures 2018. December 2020. Available online at: https://www.epa.gov/sites/production/files/2020-11/documents/2018 tables and figures fnl 508.pdf.

EPA (2019) Advancing Sustainable Materials Management: Facts and Figures 2016 and 2017. November 2019. Available online at: https://www.epa.gov/sites/default/files/2021-01/documents/2018 tables and figures dec 2020 fnl 508.pdf.

EPA (2018) Advancing Sustainable Materials Management: Facts and Figures 2015. July 2018. Available online at: https://www.epa.gov/sites/production/files/2018-

07/documents/smm 2015 tables and figures 07252018 fnl 508 0.pdf.

EPA (2016a) Industrial and Construction and Demolition Landfills. Available online at: https://www.epa.gov/landfills/industrial-and-construction-and-demolition-cd-landfills.

EPA (2016b) Advancing Sustainable Materials Management: Facts and Figures 2014. December 2016. Available online at: https://www.epa.gov/sites/production/files/2016-11/documents/2014 smm tablesfigures 508.pdf.

EPA (2014) Advancing Sustainable Materials Management: Facts and Figures 2014. February 2014. Available online at: https://www.epa.gov/sites/production/files/2015-09/documents/2012 msw dat tbls.pdf.

EPA (2008) Compilation of Air Pollution Emission Factors, Publication AP-42, Draft Section 2.4 Municipal Solid Waste Landfills. October 2008.

EPA (1993) Anthropogenic Methane Emissions in the United States, Estimates for 1990: Report to Congress, U.S. Environmental Protection Agency, Office of Air and Radiation. Washington, D.C. EPA/430-R-93-003. April 1993.

EPA (1988) *National Survey of Solid Waste (Municipal) Landfill Facilities*, U.S. Environmental Protection Agency. Washington, D.C. EPA/530-SW-88-011. September 1988.

EREF (The Environmental Research & Education Foundation) (2016). Municipal Solid Waste Management in the United States: 2010 & 2013.

ERG (2021) Production Data Supplied by ERG for 1990-2020 for Pulp and Paper, Fruits and Vegetables, and Meat. June 29, 2021.

Food Waste Reduction Alliance (FWRA) (2016) Analysis of U.S. Food Waste Among Food Manufacturers, Retailers, and Restaurants. A joint project by the Food Marketing Institute, the Grocery Manufacturers Association, and the National Restaurant Association. Available online at: https://foodwastealliance.org/wp-content/uploads/2020/05/FWRA-Food-Waste-Survey-2016-Report Final.pdf.

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Available online at https://www.ipcc.ch/report/2019-refinement-to-the-2006-ipcc-guidelines-for-national-greenhouse-gas-inventories/.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the *Fourth Assessment Report* of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Mancinelli, R. and C. McKay (1985) "Methane-Oxidizing Bacteria in Sanitary Landfills." *Proc. First Symposium on Biotechnical Advances in Processing Municipal Wastes for Fuels and Chemicals*, Minneapolis, MN, 437-450. August.

RTI (2018a) Methodological changes to the scale-up factor used to estimate emissions from municipal solid waste landfills in the Inventory. Memorandum prepared by K. Bronstein and M. McGrath for R. Schmeltz (EPA). March 22, 2018.

RTI (2018b) Comparison of industrial waste data reported under Subpart TT and the Solid Waste chapter of the GHG Inventory. Memorandum prepared by K. Bronstein, B. Jackson, and M. McGrath for R, Schmeltz (EPA). October 12, 2018.

RTI (2017) Methodological changes to the methane emissions from municipal solid waste landfills as reflected in the public review draft of the 1990-2015 Inventory. Memorandum prepared by K. Bronstein and M. McGrath for R. Schmeltz (EPA). March 31, 2017.

RTI (2011) Updated Research on Methane Oxidation in Landfills. Memorandum prepared by K. Weitz (RTI) for R. Schmeltz (EPA). January 14, 2011.

Waste Business Journal (WBJ) (2020) Directory of Waste Processing & Disposal Sites 2020.

WBJ (2016) Directory of Waste Processing & Disposal Sites 2016.

WBJ (2010) Directory of Waste Processing & Disposal Sites 2010.

Wastewater Treatment and Discharge

AF&PA (2022) "AF&PA Members Achieve Progress on Water Stewardship Goal for 2020." American Forest & Paper Association. Available online at: https://www.afandpa.org/statistics-resources/afpa-members-achieve-progress-water-stewardship-goal-2020. Accessed July 2022.

AF&PA (2020) "2020 AF&PA Sustainability Report: Advancing the sustainability of an essential industry." American Forest & Paper Association. Available online at: https://www.afandpa.org/sites/default/files/2021-07/2020_AF-PA-Sustainability-Report.pdf. Accessed June 2021.

AF&PA (2018) "2018 AF&PA Sustainability Report: Advancing U.S. Paper and Wood Products Industry Sustainability Performance." American Forest & Paper Association. Available online at: http://sustainability.afandpa.org/wp-content/uploads/2018/06/2018SustainabilityReport PAGES.pdf. Accessed July 2019.

AF&PA (2016) "2016 AF&PA Sustainability Report: Advancing U.S. Paper and Wood Products Industry Sustainability Performance." American Forest & Paper Association.

AF&PA (2014) "2014 AF&PA Sustainability Report." American Forest & Paper Association.

Beecher et al. (2007) "A National Biosolids Regulation, Quality, End Use & Disposal Survey, Preliminary Report." Northeast Biosolids and Residuals Association, April 14, 2007. Available online at: https://static1.squarespace.com/static/54806478e4b0dc44e1698e88/t/5480c7a2e4b0787f2c73ad81/14177258585575/NtlBiosldsRpt-AppD-FINAL.pdf. Accessed August 2021.

Beer Institute (2011) Brewers Almanac. Available online at: http://www.beerinstitute.org/multimedia/brewers-almanac.

Benyahia, F., M. Abdulkarim, A. Embaby, and M. Rao. (2006) Refinery Wastewater Treatment: A true Technological Challenge. Presented at the Seventh Annual U.A.E. University Research Conference.

BIER (2017) Beverage Industry Environmental Roundtable. 2016 Trends and Observations. Available online at: https://www.bieroundtable.com/benchmarking-coeu. Accessed April 2018.

Brewers Association (2021) Statistics: Number of Breweries. Available online at: https://www.brewersassociation.org/statistics-and-data/national-beer-stats/. Accessed August 2021.

Brewers Association (2017). 2016 Sustainability Benchmarking Update. Available online at: https://www.brewersassociation.org/best-practices/sustainability/sustainability-benchmarking-tools. Accessed April 2018.

Brewers Association (2016a) 2015 Sustainability Benchmarking Report. Available online at: https://www.brewersassociation.org/best-practices/sustainability/sustainability-benchmarking-tools. Accessed March 2018.

Brewers Association (2016b) Wastewater Management Guidance Manual. Available online at: https://www.brewersassociation.org/educational-publications/wastewater-management-guidance-manual. Accessed September 2017.

Cabrera (2017) "Pulp Mill Wastewater: Characteristics and Treatment." Biological Wastewater Treatment and Resource Recovery. InTech. pp. 119–139.

CAST (1995) Council for Agricultural Science and Technology. Waste Management and Utilization in Food Production and Processing. U.S.A. October 1995. ISBN 1-887383-02-6. Available online at: https://www.cast-science.org/publication/waste-management-and-utilization-in-food-production-and-processing/.

Climate Action Reserve (CAR) (2011) Landfill Project Protocol V4.0, June 2011. Available online at: http://www.climateactionreserve.org/how/protocols/us-landfill/.

Cooper (2018) Email correspondence. Geoff Cooper, Renewable Fuels Association to Kara Edquist, ERG. "Wet Mill vs. Dry Mill Ethanol Production." May 18, 2018.

DOE (2013) U.S. Department of Energy Bioenergy Technologies Office. Biofuels Basics. Available online at: http://energy.gov/eere/bioenergy/biofuels-basics. Accessed September 2013.

Donovan (1996) Siting an Ethanol Plant in the Northeast. C.T. Donovan Associates, Inc. Report presented to Northeast Regional Biomass Program (NRBP). (April). Available online at:

https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.614.856&rep=rep1&type=pdf. Accessed October 2006.

EIA (2022) Energy Information Administration. U.S. Refinery and Blender Net Production of Crude Oil and Petroleum Products (Thousand Barrels). Available online at:

https://www.eia.gov/dnav/pet/pet_pnp_refp_dc_nus_mbbl_m.htm. Accessed July 2022.

EPA (2019) Preliminary Effluent Guidelines Program Plan 14. EPA-821-R-19-005. Office of Water, U.S. Environmental Protection Agency. Washington, DC. October 2019. Available online at: https://www.epa.gov/sites/production/files/2019-10/documents/prelim-eg-plan-14 oct-2019.pdf. Accessed July 2020.

EPA (2013) U.S. Environmental Protection Agency. Report on the Performance of Secondary Treatment Technology. EPA-821-R-13-001. Office of Water, U.S. Environmental Protection Agency. Washington, D.C. March 2013. Available online at: https://www.epa.gov/sites/production/files/2015-11/documents/npdes-secondary-treatment-report-march2013.pdf.

EPA (2012) U.S. Environmental Protection Agency. Clean Watersheds Needs Survey 2012 – Report to Congress. U.S. Environmental Protection Agency, Office of Wastewater Management. Washington, D.C. Available online at: https://www.epa.gov/cwns/clean-watersheds-needs-survey-cwns-2012-report-and-data#access. Accessed February 2016.

EPA (2008) U.S. Environmental Protection Agency. Clean Watersheds Needs Survey 2008 – Report to Congress. U.S. Environmental Protection Agency, Office of Wastewater Management. Washington, D.C. Available online at: https://www.epa.gov/cwns/clean-watersheds-needs-survey-cwns-2008-report-and-data. Accessed December 2015.

EPA (2004) U.S. Environmental Protection Agency. Clean Watersheds Needs Survey 2004 – Report to Congress. U.S. Environmental Protection Agency, Office of Wastewater Management. Washington, D.C. Available online at: https://www.epa.gov/cwns/clean-watersheds-needs-survey-cwns-report-congress-2004.

EPA (2000) U.S. Environmental Protection Agency. Clean Watersheds Needs Survey 2000 - Report to Congress. Office of Wastewater Management, U.S. Environmental Protection Agency. Washington, D.C. Available online at: https://www.epa.gov/cwns/clean-watersheds-needs-survey-cwns-2000-report-and-data. Accessed July 2007.

EPA (1999) U.S. Environmental Protection Agency. Biosolids Generation, Use and Disposal in the United States. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency. Washington, D.C. EPA530-R-99-009. September 1999.

EPA (1998a) U.S. Environment Protection Agency. How Wastewater Treatment Works...The Basics. EPA F98-002. Office of Water. Washington D.C. May 1998. Available online at: https://www3.epa.gov/npdes/pubs/bastre.pdf.

EPA (1998b) U.S. Environmental Protection Agency. "AP-42 Compilation of Air Pollutant Emission Factors." Chapter 2.4, Table 2.4-3, page 2.4-13. Available online at: https://www.epa.gov/sites/default/files/2020-10/documents/c02s04.pdf.

EPA (1997a) U.S. Environmental Protection Agency. Estimates of Global Greenhouse Gas Emissions from Industrial and Domestic Wastewater Treatment. EPA-600/R-97-091. Office of Policy, Planning, and Evaluation, U.S. Environmental Protection Agency. Washington, D.C. September 1997.

EPA (1997b) U.S. Environmental Protection Agency. Supplemental Technical Development Document for Effluent Guidelines and Standards (Subparts B & E). EPA-821-R-97-011. Office of Water, U.S. Environmental Protection Agency. Washington, D.C. October 1997.

EPA (1996) U.S. Environmental Protection Agency. 1996 Clean Water Needs Survey Report to Congress. Assessment of Needs for Publicly Owned Wastewater Treatment Facilities, Correction of Combined Sewer Overflows, and Management of Storm Water and Nonpoint Source Pollution in the United States. Office of Wastewater Management, U.S. Environmental Protection Agency. Washington, D.C.

EPA (1993a) U.S. Environmental Protection Agency, "Anthropogenic Methane Emissions in the U.S.: Estimates for 1990, Report to Congress." Office of Air and Radiation, Washington, DC. April 1993.

EPA (1993b) U.S. Environmental Protection Agency. Development Document for the Proposed Effluent Limitations Guidelines and Standards for the Pulp, Paper and Paperboard Point Source Category. EPA-821-R-93-019. Office of Water, U.S. Environmental Protection Agency. Washington, D.C. October 1993.

EPA (1993c) Standards for the Use and Disposal of Sewage Sludge. 40 CFR Part 503.

EPA (1992) U.S. Environmental Protection Agency. Clean Watersheds Needs Survey 1992 - Report to Congress. Office of Wastewater Management, U.S. Environmental Protection Agency. Washington, D.C.

EPA (1982) U.S. Environmental Protection Agency. Development Document for Effluent Limitations Guidelines and standards for the Petroleum Refining. United States Environmental Protection Agency, Office of Water. EPA-440/1-82-014. Washington D.C. October 1982.

EPA (1975) U.S. Environmental Protection Agency. Development Document for Interim Final and Proposed Effluent Limitations Guidelines and New Source Performance Standards for the Fruits, Vegetables, and Specialties Segment of the Canned and Preserved Fruits and Vegetables Point Source Category. United States Environmental Protection Agency, Office of Water. EPA-440/1-75-046. Washington D.C. October 1975.

EPA (1974) U.S. Environmental Protection Agency. Development Document for Effluent Limitations Guidelines and New Source Performance Standards for the Apple, Citrus, and Potato Processing Segment of the Canned and Preserved Fruits and Vegetables Point Source Category. Office of Water, U.S. Environmental Protection Agency, Washington, D.C. EPA-440/1-74-027-a. March 1974.

ERG (2023) Memorandum: Improvements to the 1990-2021 Wastewater Treatment and Discharge Greenhouse Gas Inventory. February 2023.

ERG (2021a) Revised Memorandum: Improvements to the 1990-2019 Wastewater Treatment and Discharge Greenhouse Gas Inventory. March 2021.

ERG (2021b) Draft Memorandum: Improvements to the 1990-2020 Wastewater Treatment and Discharge Greenhouse Gas Inventory. July 2021.

ERG (2019). Memorandum: Recommended Improvements to the 1990-2018 Wastewater Greenhouse Gas Inventory. August 2019.

ERG (2018a) Memorandum: Updates to Domestic Wastewater BOD Generation per Capita. August 2018.

ERG (2018b) Memorandum: Inclusion of Wastewater Treatment Emissions from Breweries. July 2018.

ERG (2016) Revised Memorandum: Recommended Improvements to the 1990-2015 Wastewater Greenhouse Gas Inventory. November 2016.

ERG (2013a) Memorandum: Revisions to Pulp and Paper Wastewater Inventory. October 2013.

ERG (2013b) Memorandum: Revisions to the Petroleum Refinery Wastewater Inventory. October 2013.

ERG (2008a) Memorandum: Planned Revisions of the Industrial Wastewater Inventory Emission Estimates for the 1990-2007 Inventory. 10 August 2008.

ERG (2008b) Memorandum: Estimation of Onsite Treatment at Industrial Facilities and Review of Wastewater Characterization Data. 15 April 2008.

ERG (2006a) Memorandum: Recommended Improvements to EPA's Wastewater Inventory for Industrial Wastewater. Prepared for Melissa Weitz, EPA. 11 August 2006.

ERG (2006b) Memorandum: Assessment of Greenhouse Gas Emissions from Wastewater Treatment of U.S. Ethanol Production Wastewaters. Prepared for Melissa Weitz, EPA. 10 October 2006.

FAO (2022a) FAOSTAT-Forestry Database. Available online at: http://www.fao.org/faostat/en/#data/FO. Accessed July 2022.

FAO (2022b) "Pulp and Paper Capacities Report." United States. From 1998 – 2003, 2000 – 2005, 2001 – 2006, 2002 – 2007, 2003 – 2008, 2010 – 2015, 2011 – 2016, 2012 – 2017, 2013 – 2018, 2014 – 2019, 2015 – 2020, 2016 – 2021, 2017 – 2022, 2018 – 2023, 2019 – 2024, 2020-2025 reports. Available online at: http://www.fao.org/forestry/statistics/80571/en/. Accessed July 2022.

FAO (2022c) FAOSTAT-Food Balance Sheets. Available online at: http://www.fao.org/faostat/en/#data/FBS. Accessed August 2022.

Foley et al. (2015) N_2O and CH_4 Emission from Wastewater Collection and Treatment Systems: State of the Science Report and Technical Report. GWRC Report Series. IWA Publishing, London, UK.

Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers. (2004) Recommended Standards for Wastewater Facilities (Ten-State Standards).

Guisasola et al. (2008) Methane formation in sewer systems. Water Research 42(6-7): 1421-1430.

Instituto de Estadísticas de Puerto Rico. (2021). Population of Puerto Rico from 1990-1999 from "Estimados anuales poblacionales de los municipios desde 1950." Accessed February 2021. Available online at: https://censo.estadisticas.pr/EstimadosPoblacionales

IPCC (2022) Emission factor database: Emission Factor Detail (ID:625621). The Intergovernmental Panel on Climate Change. Available online at: https://www.ipcc-nggip.iges.or.jp/EFDB/ef_detail.php

IPCC (2019) 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [CalvoBuendia, E., Tanabe, K., Kranjc, A., Baasansuren, J., Fukuda, M., Ngarize S., Osako, A., Pyrozhenko, Y., Shermanau, P. and Federici, S. (eds)]. Switzerland.

IPCC (2014) 2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands. [Hiraishi, T., Krug, T., Tanabe, K., Srivastava, N., Baasansuren, J., Fukuda, M. and Troxler, T.G. (eds.)]. Published: IPCC, Switzerland.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the *Fourth Assessment Report* of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Kenari et. al (2010) An Investigation on the Nitrogen Content of a Petroleum Refinery Wastewater and its Removal by Biological Treatment. Journal of Environmental Health, Sciences, and Engineering. 7(1): 391-394.Leverenz, H.L., G. Tchobanoglous, and J.L. Darby (2010) "Evaluation of Greenhouse Gas Emissions from Septic Systems." Water Environment Research Foundation. Alexandria, VA.

Lewis, A. (2019) Email correspondence. Ann Lewis, RFA to Kara Edquist, ERG. "Wet Mill vs Dry Mill Ethanol Production." August 20, 2019.

Malmberg, B. (2018) Draft Pulp and Paper Information for Revision of EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks, Waste Chapter. National Council for Air and Stream Improvement, Inc. Prepared for Rachel Schmeltz, EPA. June 13, 2018.

Merrick (1998) Wastewater Treatment Options for the Biomass-to-Ethanol Process. Report presented to National Renewable Energy Laboratory (NREL). Merrick & Company. Subcontract No. AXE-8-18020-01. October 22, 1998.

Metcalf & Eddy, Inc. (2014) Wastewater Engineering: Treatment and Resource Recovery, 5th ed. McGraw Hill Publishing.

Metcalf & Eddy, Inc. (2003) Wastewater Engineering: Treatment, Disposal and Reuse, 4th ed. McGraw Hill Publishing.

NEBRA (2022) "U.S. National Biosolids Data." Northeast Biosolids and Residuals Associations. Available online at: https://static1.squarespace.com/static/601837d1c67bcc4e1b11862f/t/62f4f5fbae32804dd9f51ef6/166022092535 6/National BiosolidsDataSummary NBDP 20220811.pdf

Nemerow, N.L. and A. Dasgupta (1991) Industrial and Hazardous Waste Treatment. Van Nostrand Reinhold. NY. ISBN 0-442-31934-7.

NRBP (2001) Northeast Regional Biomass Program. An Ethanol Production Guidebook for Northeast States. Washington, D.C. (May 3).

Rendleman, C.M. and Shapouri, H. (2007) New Technologies in Ethanol Production. USDA Agricultural Economic Report Number 842.

RFA (2022a) Renewable Fuels Association. Annual U.S. Fuel Ethanol Production. Available online at: https://ethanolrfa.org/statistics/annual-ethanol-production. Accessed July 2022.

RFA (2022b) Renewable Fuels Association. Monthly Grain Use for U.S. Ethanol Production Report. Available online at: https://ethanolrfa.org/statistics/feedstock-use-co-product-output. Accessed July 2021.

Ruocco (2006a) Email correspondence. Dr. Joe Ruocco, Phoenix Bio-Systems to Sarah Holman, ERG. "Capacity of Bio-Methanators (Dry Milling)." October 6, 2006.

Ruocco (2006b) Email correspondence. Dr. Joe Ruocco, Phoenix Bio-Systems to Sarah Holman, ERG. "Capacity of Bio-Methanators (Wet Milling)." October 16, 2006.

Short et al. (2017) Dissolved Methane in the Influent of Three Australian Wastewater Treatment Plants Fed by Gravity Sewers. Sci Total Environ 599-600: 85-93.

Short et al. (2014) Municipal Gravity Sewers: an Unrecognised Source of Nitrous Oxide. Sci Total Environ 468-469: 211-218.

Stier, J. (2018) Personal communications between John Stier, Brewers Association Sustainability Mentor and Amie Aguiar, ERG. Multiple dates.

Sullivan (SCS Engineers) (2010) The Importance of Landfill Gas Capture and Utilization in the U.S. Presented to SWICS, April 6, 2010. Available online at: https://www.scsengineers.com/scs-white-papers/the-importance-oflandfill-gas-capture-and-utilization-in-the-u-s/.

Sullivan (SCS Engineers) (2007) Current MSW Industry Position and State of the Practice on Methane Destruction Efficiency in Flares, Turbines, and Engines. Presented to Solid Waste Industry for Climate Solutions (SWICS). July 2007. Available online at: https://www.scsengineers.com/wp-

content/uploads/2015/03/Sullivan LFG Destruction Efficiency White Paper.pdf.

TTB (2022) Alcohol and Tobacco Tax and Trade Bureau. Beer Statistics. Available online at: https://www.ttb.gov/beer/beer-stats.shtml. Accessed July 2021.

UNFCCC (2012) CDM Methodological tool, Project emissions from flaring (Version 02.0.0). EB 68 Report. Annex 15. Available online at: http://cdm.unfccc.int/methodologies/PAmethodologies/PAmethodologies/tools/am-tool-06-v1.pdf/history_view.

- U.S. Census Bureau (2022) International Database. Available online at: https://www.census.gov/data-tools/demo/idb/#/trends?YR ANIM=2020&dashPages=DASH&FIPS SINGLE=US&COUNTRY YEAR=2020&menu=trendsViz&TREND RANGE=1990,2021&TREND STEP=1&TREND ADD YRS=&FIPS=AQ,GQ,CQ,RQ,VQ&measures=POP. Accessed July 2022.
- U.S. Census Bureau (2021a). Annual Estimates of the Resident Population for the United States, Regions, States, and Puerto Rico: April 1, 2010 to July 1, 2020. Available online at: https://www.census.gov/data/tables/time-series/demo/popest/2010s-state-total.html
- U.S. Census Bureau (2021b). International Database. Available online at: https://www.census.gov/data/tables/time-series/demo/popest/2020s-national-total.html. Accessed July 2022.
- U.S. Census Bureau (2019) "American Housing Survey." Table 1A-4: Selected Equipment and Plumbing--All Housing Units. From 1989, 1991, 1993, 1995, 1997, 1999, 2001, 2003, 2005, 2007, and 2009 reports. Table C-04-AO Plumbing, Water, and Sewage Disposal--All Occupied Units. From 2011, 2013, 2015, 2017, and 2019 reports. Available online at http://www.census.gov/programs-surveys/ahs/data.html. Accessed August 2021.
- U.S. Census Bureau (2013) "American Housing Survey." Table 1A-4: Selected Equipment and Plumbing--All Housing Units. From 1989, 1991, 1993, 1995, 1997, 1999, 2001, 2003, 2005, 2007, and 2009 reports. Table C-04-AO Plumbing, Water, and Sewage Disposal--All Occupied Units. From 2011, and 2013 reports. Available online at http://www.census.gov/programs-surveys/ahs/data.html. Accessed May 2020.
- U.S. Census Bureau, Population Division. (2011). Table 1. Intercensal Estimates of the Resident Population for the United States, Regions, States, and Puerto Rico: April 1, 2000 to July 1, 2010 (ST-EST00INT-01), Release Date: September 2011. Available online at: https://www2.census.gov/programs-surveys/popest/datasets/2000-2010/intercensal/state/st-est00int-alldata.csv
- U.S. Census Bureau, Population Division (2002). Table CO-EST2001-12-00 Time Series of Intercensal State Population Estimates: April 1, 1990 to April 1, 2000. Available online at: https://www2.census.gov/programs-surveys/popest/tables/1990-2000/intercensal/st-co/co-est2001-12-00.pdf
- USDA (2022a) U.S. Department of Agriculture. National Agricultural Statistics Service. Washington, D.C. Available online at: https://www.nass.usda.gov/Publications/ and https://quickstats.nass.usda.gov/. Accessed September 2022
- USDA (2022b) U.S. Department of Agriculture. National Agricultural Statistics Service. Vegetables 2021 Summary. Available online at: https://usda.library.cornell.edu/concern/publications/02870v86p?locale=en. Accessed September 2022.
- USDA (2021) U.S. Department of Agriculture. Economic Research Service. Nutrient Availability. Washington D.C. Available online at: <a href="https://www.ers.usda.gov/data-products/food-availability-per-capita-data-system/food-availability-per-capita-system/food-availability-per-capit
- U.S. Poultry (2006) Email correspondence. John Starkey, USPOULTRY to D. Bartram, ERG. 30 August 2006.
- White and Johnson (2003) White, P.J. and Johnson, L.A. Editors. Corn: Chemistry and Technology. 2nd ed. AACC Monograph Series. American Association of Cereal Chemists. St. Paul, MN.
- World Bank (1999) Pollution Prevention and Abatement Handbook 1998, Toward Cleaner Production. The International Bank for Reconstruction and Development/The WORLDBANK. 1818 H Street, N.W. Washington, DC. 20433, USA. ISBN 0-8213-3638-X.

Composting

BioCycle (2018a) Organic Waste Bans and Recycling Laws to Tackle Food Waste. Prepared by E. Broad Lieb, K. Sandson, L. Macaluso, and C. Mansell. Available online at: https://www.biocycle.net/2018/09/11/organic-wastebans-recycling-laws-tackle-food-waste/.

BioCycle (2018b). State Food Waste Recycling Data Collection, Reporting Analysis. Prepared by Nora Goldstein. Available online at: http://compostcolab.wpengine.com/wp-content/uploads/2018/11/State-Food-Waste-Recycling-Data-Collection-Reporting-Analysis.pdf.

BioCycle (2010) The State of Garbage in America. Prepared by Rob van Haaren, Nickolas Themelis and Nora Goldstein. Available online at http://www.biocycle.net/images/art/1010/bc101016 s.pdf.

BioCycle (2017) The State of Organics Recycling in the U.S. Prepared by Nora Goldstein. Available online at http://www.biocycle.net/17 10 06 1/0001/BioCycle StateOfOrganicsUS.pdf.

Cornell Composting (1996). Monitoring Compost Moisture. Cornell Waste Management Institute. Available online at: http://compost.css.cornell.edu/monitor/monitormoisture.html.

Cornell Waste Management Institute (2007) The Science of Composting. Available online at http://cwmi.css.cornell.edu/chapter1.pdf.

EPA (2020a) Advancing Sustainable Materials Management: 2018 Tables and Figures. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. Available online at: https://www.epa.gov/sites/default/files/2021-01/documents/2018 tables and figures dec 2020 fnl 508.pdf.

EPA (2020b) 2018 Wasted Food Report. November 2020. Available online at https://www.epa.gov/sites/default/files/2020-11/documents/2018 wasted food report.pdf.

EPA (2018) Advancing Sustainable Materials Management: 2015 Tables and Figures. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. Available online at https://www.epa.gov/sites/production/files/2018-07/documents/smm 2015 tables and figures 07252018 fnl 508 0.pdf.

EPA (2016) Advancing Sustainable Materials Management: Facts and Figures 2014. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. Available online at https://www.epa.gov/sites/production/files/2016-11/documents/2014 smm tablesfigures 508.pdf.

EPA (2014) Municipal Solid Waste in the United States: 2012 Facts and Figures. Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. Available online at https://www.epa.gov/sites/default/files/2015-09/documents/2012 msw fs.pdf.

Harvard Law School and Center for EcoTechnology (CET) (2019) Bans and Beyond: Designing and Implementing Organic Waste Bans and Mandatory Organics Recycling Laws. Prepared by Katie Sandson and Emily Broad Leib, Harvard Law School Food Law and Policy Clinic, with input from Lorenzo Macaluso and Coryanne Mansell, Center for EcoTechnology (CET). Available online at https://wastedfood.cetonline.org/wp- content/uploads/2019/07/Harvard-Law-School-FLPC-Center-for-EcoTechnology-CET-Organic-Waste-Bans-Toolkit.pdf.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Volume 5: Waste, Chapter 4: Biological Treatment of Solid Waste, Table 4.1. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change, H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan. Available online at https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/5 Volume5/V5 4 Ch4 Bio Treat.pdf.

Institute for Local Self-Reliance (ISLR) (2014). State of Composting in the US: What, Why, Where & How. Available at http://ilsr.org/wp-content/uploads/2014/07/state-of-composting-in-us.pdf.

Kijanka (2020) Email correspondence. Kenin Kijanka, EPA Region 2 to Rachel Schmeltz, EPA HQ. "Puerto Rico Composting Operations." November 13, 2020.

Northeast Recycling Council (NERC) (2020) Disposal Bans & Mandatory Recycling in the United States. Available online at https://nerc.org/documents/disposal%20bans%20mandatory%20recycling%20united%20states.pdf.

University of Maine (2016). Compost Report Interpretation Guide. Soil Testing Lab. Available online at: https://umaine.edu/soiltestinglab/wp-content/uploads/sites/227/2016/07/Compost-Report-Interpretation-Guide.pdf.

U.S. Census Bureau (2021) Table 1. Annual Estimates of the Resident Population for the United States, Regions, States, the District of Columbia, and Puerto Rico: April 1, 2010 to July 1, 2019; April 1, 2020; and July 1, 2020 (NST-EST2020). Available online at https://www.census.gov/programs-surveys/popest/technical-documentation/research/evaluation-estimates/2020-evaluation-estimates/2010s-totals-national.html.

U.S. Census Bureau, Population Division (2022) Table 1. Annual Estimates of the Resident Population for the United States, Regions, States, the District of Columbia, and Puerto Rico: April 1, 2020 to July 1, 2021 (NST-EST2021-POP). Available online at https://www.census.gov/data/datasets/time-series/demo/popest/2020s-national-total.html.

U.S. Composting Council (2010) Yard Trimmings Bans: Impact and Support. Prepared by Stuart Buckner, Executive Director, U.S., Composting Council. Available online at https://cdn.vmaws.com/www.compostingcouncil.org/resource/resmgr/images/advocacy/Vard-Trimmings-Ban-

https://cdn.ymaws.com/www.compostingcouncil.org/resource/resmgr/images/advocacy/Yard-Trimmings-Ban-Impacts-a.pdf.

U.S. Composting Council (2022) State and City Organics Bans, as of June 2021. Accessed on September 29, 2022. Available at https://www.compostingcouncil.org/page/organicsbans.

Anaerobic Digestion at Biogas Facilities

Bronstein, Kate (2021). Expert Judgement Uncertainty of quantity of materials digested. RTI International, Solid Waste Management GHG Expert.

EPA (2021) Anaerobic Digestion Facilities Processing Food Waste in the United States (2017 & 2018): Survey Results. January 2021 EPA/903/S-21/001. Available online at https://www.epa.gov/sites/default/files/2021-02/documents/2021 final ad report feb 2 with links.pdf.

EPA (2020) Types of Anaerobic Digesters: Common Ways to Describe Digesters. Available online at https://www.epa.gov/anaerobic-digestion/types-anaerobic-digesters.

EPA (2019) Anaerobic Digestion Facilities Processing Food Waste in the United States in 2016: Survey Results. September 2019 EPA/903/S-19/001. Available online at https://www.epa.gov/sites/production/files/2018-08/documents/ad-data-report final-508 compliant no password.pdf.

EPA (2018) Anaerobic Digestion Facilities Processing Food Waste in the United States in 2015: Survey Results. May 2018 EPA/903/S-18/001. Available online at https://www.epa.gov/sites/production/files/2019-09/documents/ad data report v10 - 508 comp v1.pdf.

EPA (2016) Frequently Asked Questions About Anaerobic Digestion. Available online at https://www.epa.gov/anaerobic-digestion/frequent-questions-about-anaerobic-digestion#codigestion.

EPA (1993) Anthropogenic Methane Emissions in the U.S.: Estimates for 1990, Report to Congress. Office of Air and Radiation, Washington, DC. April 1993.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Volume 5: Waste, Chapter 4: Biological Treatment of Solid Waste, Table 4.1. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change, H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.). Hayama, Kanagawa, Japan. Available online at https://www.ipcc-

nggip.iges.or.jp/public/2006gl/pdf/5 Volume5/V5 4 Ch4 Bio Treat.pdf.

IPCC (2007) Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the *Fourth Assessment Report* of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

Water Environment Federation (WEF) (2012) What Every Operator Should Know about Anaerobic Digestion. Available online at https://www.wef.org/globalassets/assets-wef/direct-download-library/public/operator-essentials/wet-operator-essentials---anaerobic-digestion---dec12.pdf.

Waste Incineration

RTI (2010) Hospital/Medical/Infectious Waste Incinerators: Summary of Requirements for Revised or New Section 111(d)/129 State Plans Following Amendments to the Emission Guidelines. Available online at https://nepis.epa.gov/Exe/ZyPDF.cgi/P1009ZW6.PDF?Dockey=P1009ZW6.PDF.

Waste Sources of Precursor Greenhouse Gas Emissions

EPA (2023a) "Criteria pollutants National Tier 1 for 1970 - 2022." National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data. Office of Air Quality Planning and Standards, March 2023. Available online at: https://www.epa.gov/air-emissions-inventories/air-pollutant-emissions-trends-data.

EPA (202<u>3</u>b) "2020 National Emissions Inventory Technical Support Document: Introduction." Office of Air Quality Planning and Standards, March 2023. Available online at: https://www.epa.gov/system/files/documents/2023-01/NEI2020 TSD Section 1 Introduction.pdf.

Recalculations and Improvements

EIA (2023) *Monthly Energy Review, February 2023*. Energy Information Administration, U.S. Department of Energy. Washington, D.C. DOE/EIA-0035(2023/02).

EIA (2022) International Energy Statistics 1980-2021. Energy Information Administration, U.S. Department of Energy. Washington, D.C. Available online at: https://www.eia.gov/beta/international/.

EPA (2019) *Motor Vehicle Emissions Simulator (MOVES)*. Office of Transportation and Air Quality, U.S. Environmental Protection Agency. Available online at: https://www.epa.gov/moves.

IPCC (2013) Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 pp.

IPCC (2007) *Climate Change 2007: The Physical Science Basis*. Contribution of Working Group I to the *Fourth Assessment Report* of the Intergovernmental Panel on Climate Change. [S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press. Cambridge, United Kingdom 996 pp.

IPCC (2006) 2006 IPCC Guidelines for National Greenhouse Gas Inventories. The National Greenhouse Gas Inventories Programme, The Intergovernmental Panel on Climate Change. [H.S. Eggleston, L. Buendia, K. Miwa, T. Ngara, and K. Tanabe (eds.)]. Hayama, Kanagawa, Japan.

Soil Survey Staff (2020a) Gridded National Soil Survey Geographic (gNATSGO) Database for the Conterminous United States. United States Department of Agriculture, Natural Resources Conservation Service. Available online at https://nrcs.app.box.com/v/soils.

Soil Survey Staff (2020b) Gridded National Soil Survey Geographic (gNATSGO) Database for Alaska. United States Department of Agriculture, Natural Resources Conservation Service. Available online at https://nrcs.app.box.com/v/soils.

STATSGO2 (2016) Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. U.S. General Soil Map (STATSGO2). Available online at https://sdmdataaccess.sc.egov.usda.gov. Accessed 10 November 2016.

Abbreviations

ACC American Chemistry Council BTS Bureau of Transportation Statistics, U.S. AEDT FAA Aviation Environmental Design Tool Department of Transportation AEO Annual Energy Outlook Btu British thermal unit AER All-electric range AFRAPA American Forest and Paper Association AFRAPA American Forest and Paper Association AFRAPA American Forest and Paper Association AFRAPA Affect Alternative Fluorocarbon Environmental Acceptability Study AFRAPA Alternative fluorocarbon Environmental Acceptability Study AFRAPA Alternative fluorocarbon Environmental ACC ARAPA AFRAPA Alternative fluorocarbon Environmental AGA American Sassociation AGA Adigas removal AGA American Gas Association AGA Adigas removal AGA American Industry Alternative fluorocarbon Institute African Materian Inovation and Manufacturing Act AISI American Inovation and Steel Institute AIVI Agriculture and Land Use American Natural Gas Alliance CEMS Continuous emission monitoring system ANCA American Natural Gas Alliance CEMS Continuous emission monitoring system ANCA American Natural Gas Alliance CEMS Continuous emission monitoring system API American Petroleum Institute CFR Code of Federal Regulations API American Petroleum Institute CFR Code of Federal Regulations API American Posturia Assessment Report CHIPA ARS IPCC Fourth Assessment Report CHIPA ARS IPCC Fourth Assessment Report CHIPA ARS IPCC Fifth Assessment Report ARIA Altoroperssive moving-average CKD Cement kill adult Advanced Resources International CMM Codal international Council on Large Electric Systems ARMA Autoregressive moving-average CKD Compressed Gas Association CMM Codal international Council on Large Electric Systems CMA ARMA Autored Resources	ABS	Acrylonitrile butadiene styrene	BSEE	Bureau of Safety and Environmental
AEDT FAA Awiston Environmental Design Tool AEO Annual Energy Outlook AER All-electric range C Carbon AF&PA American Forest and Paper Association C&D Construction and demolition waste AF&A American Forest and Paper Association C&D Construction and demolition waste AF&A American Forest and Paper Association C&D Construction and demolition waste AF&A Alternative Fluorocarbon Environmental C&EN Chemical and Engineering News Acceptability Study AFOLU Agriculture, Forestry, and Other Land Use AFOLU Agriculture, Forestry, and Other Land Use AGA American Gas Association AGA American Gas Association AGA American Gas Association AGA Adig as removal AIRI Alf-Conditioning, Heating, and Refrigeration AIRI Alf-Conditioning, Heating, and Refrigeration AIRI Alf-Conditioning, Heating, and Refrigeration AIRI American Innovation and Manufacturing Act AIRI American Innovation and Manufacturing Act AIRI American Innovation and Manufacturing Act AIRI Agriculture and Land Use ANGA American Association ANGA American Natural Gas Alliance CEFM Cattle Enteric Fermentation Model ANGA American Plastics Council API American Plastics Council API American Plastics Council API American Public Transportation Association ARA IPCC Forth Assessment Report ARA Autoregressive moving-average ANGA American Short-line and Regional Railroad ARA American Society for Testing and Materials ASAE American Short-line and Regional Railroad ARA American Divine Amaples	AC	Air conditioner		Enforcement
AEO Annual Energy Outlook Bru British thermal unit AER All-electric range C C Carbon AF&PA American Forest and Paper Association AF&APA Alternative Fluorocarbon Environmental AFCUU Agriculture, Forestry, and Other Land Use AFAV Alternative fuel vehicle AGA American Gas Association AFAV Alternative fuel vehicle AGA American Gas Association AGR Acid gas removal AIRE Atmospheric and Health Effect Framework AIRE Atmospheric and Health Effect Framework AIRE Almospheric and Health Effect Framework AIRE American Innovation and Manufacturing Act AIRE American Natural Gas Alliance CEMS ANCA American Natural Gas Alliance ARAL Argonne National Laboratory CFC APC American Piblistic Council ARA IPCC Fourth Assessment Report APTA American Petroleum Institute CFA Compressed Gas Association ARA IPCC Fourth Assessment Report ARA Avanced Resources International CIGRE ARMA Autoregressive moving-average CKD ARMA American Society of Agricultural Engineers ASAEA American Society of Agricultural Engi	ACC	American Chemistry Council	BTS	Bureau of Transportation Statistics, U.S.
AER All-electric range C C Carbon AF&PA American Forest and Paper Association AFAEAS Alternative Fluorocarbon Environmental Acceptability Study AFOLU Agriculture, Forestry, and Other Land Use AFOL AGA Alternative fuel vehicle AGA American Gas Association AGR Acid gas removal AIR Acid gas removal AIR Alr-Conditioning, Heating, and Refrigeration Institute AIR Air-Conditioning, Heating, and Refrigeration Institute AIR AIR American Innovation and Manufacturing Act AIRI American Innovation and Manufacturing Act AIRI Agriculture and Land Use ANGA American Natural Gas Alliance ANGA American Natural Gas Alliance AIRI Agriculture and Land Use ANGA American Plastics Council APA American Plastics Council APA American Proteioum Institute APTA American Public Transportation Association ARA IPCC Forth Assessment Report ARA Advanced Resources International ARA Advanced Resources International ARA Advanced Resources International ARA Advanced Resources International ARA American Short-line and Regional Railroad ARA American Society for Festing and Materials ARA American	AEDT	FAA Aviation Environmental Design Tool		Department of Transportation
AF&PA American Forest and Paper Association C&D Construction and demolition waste AFEAS Alternative Fluorocarbon Environmental C&EN Chemical and Engineering News AFOLU Agriculture, Forestry, and Other Land Use CAPOS Concentrated Animal Feeding Operations AFV Alternative fuel vehicle CaO Calcium oxide AGA American Gas Association CAPO Candidian Association of Petroleum Producers AGR Acid gas removal CABB California Air Resources Board AHEF Atmospheric and Health Effect Framework CBI Confidential business information AHRI Air-Conditioning, Heating, and Refrigeration Institute CCAP Costal Change Analysis Program AIM Act American Inon and Steel Institute CEAP USDA-NRCS Conservation Effects Assessment AISI American Inon and Steel Institute CEFM Cattle Enteric Fermentation Model ANL Argonne National Laboratory CFC Chlorofluorocarbon API American Public Transportation Association CFR Code of Federal Regulations API American Sessement Report <	AEO	Annual Energy Outlook	Btu	British thermal unit
AFEAS Alternative Fluorocarbon Environmental C&EN Chemical and Engineering News Acceptability Study CAAA Clean Air Act Amendments of 1990 Afrollum Acceptability Study CAAA Clean Air Act Amendments of 1990 Afrollum Agriculture, Forestry, and Other Land Use CAPO Calcium oxide CaPO Calcium oxide CAPO Canadian Association of Petroleum Producers AGA American Gas Association CAPP CARB California Air Resources Board California Air Conditioning, Heating, and Refrigeration C-CAP Coastal Change Analysis Program Institute CAPP CAPO COASTA Chemical Data Access Tool USDA-NRCS Conservation Effects Assessment Program CAPA CAPA CAPA CAPA CAPA CAPA CAPA CAP	AER	All-electric range	С	Carbon
Acceptability Study AFOLU Agriculture, Forestry, and Other Land Use AFOL Agriculture, Forestry, and Other Land Use AFOL AFOL Afternative fuel vehicle AGA AFOL AGR ACI dear a fas Association AGR ACI dear a fas Association AGR Acid gas removal AHEF Atmospheric and Health Effect Framework AHIF Alfrechamical Carl AHIF American Innovation and Manufacturing Act CEAP AISI American Innovation and Manufacturing Act AISI American Innovation and Manufacturing Act AISI American Innovation and Manufacturing Act AISI American Natural Gas Alliance CEAP ANDA-MRCS Conservation Effects Assessment Program AIL Agriculture and Land Use CEAM California Air Enteric Fermentation Model Cattle Enteric Fermentation Model Cattle Enteric Fermentation Model ANGA American Natural Gas Alliance CEMS Continuous emission monitoring system Chorofluorocarbon APIC American Plastics Council CFR Code of Federal Regulations API American Plastics Council CFR Code of Federal Regulations API American Petroleum Institute CGA Compressed Gas Association CHa Methane ARIFI APIC Fourth Assessment Report CHAPA California Health and Productivity Audit ARIS IPCC Fith Assessment Report CHAPA California Health and Productivity Audit ARIS IPCC Fith Assessment Report CHAPA California Health and Productivity Audit ARIS AVanced Resources International CIGRE International Council on Large Electric Systems CARIMA Advanced Resources International CIGRE International Council on Large Electric Systems CMA Chemical Manufacturer's Association CMM Cond Demical Manufacturer's Association CMM Cond Demical Manufacturer's Association CMM Component ratio methan Cond Courses Market Reporter CAPA Carbon monoxide CEM Cond Course Demand Core Colorado Oll and Gas Conservation Comm	AF&PA	American Forest and Paper Association	C&D	Construction and demolition waste
AFOLU Agriculture, Forestry, and Other Land Use CAPOS Concentrated Animal Feeding Operations AFV Alternative fuel vehicle CaO Calcium oxide CaGO Calcium oxide AGA American Gas Association CAPP Canadian Association of Petroleum Producers AGR Adid gas removal CABB California Air Resources Board Atmospheric and Health Effect Framework CBI Confidential business information Institute Capaban American Innovation and Manufacturing Act CBI Confidential business information Institute Capaban American Innovation and Manufacturing Act CEAP Cobaban Access Tool USDA-NRCS Conservation Effects Assessment Program American Iron and Steel Institute Program American Iron and Island Use Agriculture and Land Use Agriculture and Land Use Argonne National Laboratory CFC Chlorofluorocarbon APA American Plastics Council CFR Code of Federal Regulations Continuous emission monitoring system API American Proleum Institute CFR Code of Federal Regulations CPR American Public Transportation Association CH4 Methane API American Proleum Institute CFR Code of Federal Regulations CPR CFI CFI Assessment Report CH4 Methane ProCC Fourth Assessment Report CH4 Advanced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cembral Association CMA Agricultural Resource Management Surveys CLE Crown Light Exposure American Society of Agricultural Engineers ASAE American Society of Agricultural Engineers CMA American Society for Testing and Materials CMA Chemical Manufacturer's Association CMM Coal mine methane CFR Chemical Oxide Cembral Agricultural Resource Management CPR COMD Coalbed Methane Outreach Program API American Society for Testing and Materials CMA Compressed natural gas CCFR Common Reporting Format CPR Co	AFEAS	Alternative Fluorocarbon Environmental	C&EN	Chemical and Engineering News
AFOLU Agriculture, Forestry, and Other Land Use AFV Alternative fuel vehicle AGA American Gas Association AGR Acid gas removal AITER Atmospheric and Health Effect Framework AHRI Air-Conditioning, Heating, and Refrigeration Institute AITER American Innovation and Manufacturing Act AITER American Public Transportation APTA American Public Transportation Association APTA American Public Transportation Association APTA American Public Transportation Association ARTA IPCC Fifth Assessment Report CHAPA California Health and Productivity Audit ARTS IPCC Fifth Assessment Report CHAPA California Health and Productivity Audit ARTS IPCC Fifth Assessment Report CHAPA California Health and Productivity Audit AVAnced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust ANAMA Autoregressive moving-average CKD Cement kiln dust American Society of Agricultural Engineers ASAE American Society of Agricultural Engineers CMA Chemical Manufacturer's Association ASRA Annual Statistical Report CMA Chemical Manufac		Acceptability Study	$C\Lambda\Lambda\Lambda$	Clean Air Act Amendments of 1990
AFV Alternative fuel vehicle AGA American Gas Association CAPP Canadian Association of Petroleum Producers AGR Acid gas removal AHEF Atmospheric and Health Effect Framework AHER Altro-Conditioning, Heating, and Refrigeration Institute AIM Act American Innovation and Manufacturing Act AIM Agriculture and Land Use ANGA American Natural Gas Alliance ANGA American Pastics Council API American Pastics Council API American Potoleum Institute API American Society of Agricultural Engineers API ACT Combined heat and power API American Society of Agricultural Engineers API Advanced Resources International Alti Advanced Resources Management Surveys CIE Crown Light Exposure ASAE American Society of Agricultural Engineers ASAE American Society of Agricultural Engineers ASAE American Society of Agricultural Engineers ASAE American Society of Potoleum Agricultural Engineers ASAE American Society of Potoleum Agricultural Engineers ASAE American Society of Agricu	AFOLU	Agriculture, Forestry, and Other Land Use		
AGR Adig as removal AGR Acid gas removal AHEF Atmospheric and Health Effect Framework AHIF AHTOMOSINIA, Heating, and Refrigeration institute AIM Act American Innovation and Manufacturing Act AISI AMACT AM	AFV	Alternative fuel vehicle		
AGR ACID gas removal AHEF AHTER Atmospheric and Health Effect Framework AHRI Alr-Conditioning, Heating, and Refrigeration Institute AMACID American Innovation and Manufacturing Act AMACID American Innovation and Manufacturing Act CEAP AMACID American Innovation and Manufacturing Act CEAP American Innovation and Manufacturing Act CEAP American Innovation and Manufacturing Act American Innovation and Manufacturing Act CEAP American Innovation and Manufacturing Act CEAP American Innovation and Manufacturing Act American Innovation and Manufacturing Act CEAP AMACID American Natural Gas Alliance CEMS Continuous emission monitoring system ANL Argonne National Laboratory CFC Chlorofluorocarbon APC American Plastics Council CFR Code of Federal Regulations CFC Chlorofluorocarbon CFC Chlorofluorocarbon CFC Chlorofluorocarbon CFC Chlorofluorocarbon CFC American Plastics Council CFR Code of Federal Regulations CFG Compressed Gas Association APC American Public Transportation Association CFA COMPRESSED Association CFA COMPRESSED Association APC APC American Petroleum Institute CFA COMPRESSED Association CFA Compressed Gas Association CFC Comp	AGA	American Gas Association		
AHER Atmospheric and Health Effect Framework AHRI Air-Conditioning, Heating, and Refrigeration Institute CDAT Chemical Data Access Tool Alm Act American Innovation and Manufacturing Act CEAP USDA-NRCS Conservation Effects Assessment Program Anglysis Program CEAP USDA-NRCS Conservation Effects Assessment Program August Program CEAP USDA-NRCS Conservation Effects Assessment Program August Program CEAP USDA-NRCS Conservation Effects Assessment Program August Program CEAP USDA-NRCS Conservation Effects Assessment Program CEAP USDA-NRCS Conservation Effects Assessment Program August Program CEAP USDA-NRCS Conservation Effects Assessment Program CEAP USDA-NRCS Conservation Effects Assessment Report CEAP CEAP CEAP CEAP CEAP CEAP CEAP CEAP	AGR	Acid gas removal		
AHRI Air-Conditioning, Heating, and Refrigeration C-CAP Coastal Change Analysis Program Institute CDAT Chemical Data Access Tool CAP American Innovation and Manufacturing Act CEAP USDA-NRCS Conservation Effects Assessment Program ALU Agriculture and Land Use American Invalvarial Gas Alliance CEMS Continuous emission monitoring system ANGA American Natural Gas Alliance CEMS Continuous emission monitoring system Chlorofluorocarbon APC American Plastics Council CFC Chlorofluorocarbon CFC Chlorofluorocarbon APC American Plastics Council CFC Chlorofluorocarbon APC American Petroleum Institute CFC CONTON CFC Chlorofluorocarbon APC American Public Transportation Association CF4 Methane APA IPCC Fourth Assessment Report CFC ChapPa California Health and Productivity Audit CFC Control Assessment Report CFC ChapPa California Health and Productivity Audit CFC Confidence interval ARI Advanced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust Autoregressive moving-average CKD Cement kiln dust Association Association Association CMM Coal mine methane Association ASR American Society of Agricultural Engineers CMA Chemical Manufacturer's Association CMM Coal mine methane Association Association Association Association Association Association Association CMM Coal mine methane CMAP Compressed natural gas CCFC Carbon monoxide CFF COOL Carbon monoxide CFF COOL Carbon monoxide CFF COOL Carbon monoxide CFF COOL Constant Cool Control Cool Control Cool Control Cool Control Cool Conservation Commission CFF CPF Common Reporting Format CFF Conservation Reserve Program CFF Conservation Reserve Program CFF Conservation Reserve Program CFF COOL Conservation Reserve Program CFF COOL Conservation Technology Information Center CFF Common Regulation and Enforcement CFF Conservation Technology Information Center CFF Common Regulation and Enforcement CFF Cool Conservation Technology Information Center CFF Common Regulation and Enforcement CFF Cool CFF Cool Conserva	AHEF	Atmospheric and Health Effect Framework		
Institute American Innovation and Manufacturing Act Alsi American Iron and Steel Institute ALU Agriculture and Land Use ANGA American Natural Gas Alliance ALU Agriculture and Land Use Argonne National Laboratory APC American Plastics Council API American Petroleum Institute APT American Public Transportation Association APT American Public Transportation Association APT American Public Transportation Association APA Advanced Resources International APA American Society of Agricultural Engineers APA American Society of Agricultural Engineers APA American Society of Agricultural Engineers APA American Society for Testing and Materials APA American Society for Testing and Material	AHRI			
AIM Act American Innovation and Manufacturing Act AISI American Iron and Steel Institute AIU Agriculture and Land Use Agriculture and Land Use CEFM Cattle Enteric Fermentation Model CANGA American Natural Gas Alliance CEMS Continuous emission monitoring system CANL Argonne National Laboratory CFC Chlorofluorocarbon APC American Plastics Council CFR Code of Federal Regulations CMAPC American Public Transportation Association APTA American Public Transportation Association CH4 Methane IPCC Fourth Assessment Report CHAPA California Health and Productivity Audit CMAPA IPCC Forth Assessment Report CHAPA California Health and Productivity Audit CMAPA AUdit Assessment Report CHAPA California Health and Productivity Audit CMAPA AUdit Assessment Report CHAPA California Health and Productivity Audit CMAPA AUdit Assessment Report CHAPA California Health and Productivity Audit CMAPA AUdit Assessment Report CHAPA California Health and Productivity Audit CMAPA Audit Advanced Resources International ClGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust Cement kiln dust Cream ARMA Autoregressive moving-average CKD Cement kiln dust Coll mine methane CMAPA Association CMM Coll mine methane CMAPA Coll mine methane CMAPA Chemical Manufacturer's Association CMM Coll mine methane CMAPA Chemical Manufacturer's Association CMAPA Chemical Manufacturer's Association CMAPA Chemical Manufacturer's CMAPA Chemical Market Reporter CMAPA California data Mapa CMAPA Chemical Market Reporter CMAPA Compressed andural gas CMAPA American Society for Testing and Materials CMAPA Chemical Market Reporter CMAPA Compressed andural gas CMAPA Chemical Oxygen demand CMAPA Chemical Oxygen demand CMAPA COMPRESS COLORIA COLORIA COLORIA COLORIA COLORIA CHAPA CALIFORNIA CH				
ASI American Iron and Steel Institute ALU Agriculture and Land Use ANGA American Natural Gas Alliance CEMS Continuous emission monitoring system CFC Chlorofluorocarbon APC American Plastics Council APC American Plastics Council CFR Code of Federal Regulations API American Public Transportation Association APTA American Public Transportation Association AR4 IPCC Fourth Assessment Report AR5 IPCC Fifth Assessment Report CHP Combined heat and power AR6 IPCC Sixth Assessment Report CI Confidence interval AR7 Advanced Resources International AR7 Autoregressive moving-average CKD Cement kiln dust AR7 Agricultural Resource Management Surveys ASAE American Society of Agricultural Engineers ASLRRA American Society of Agricultural Engineers ASLRRA American Society of Agricultural Engineers ASLRRA American Society of Testing and Materials AZR American Society for Testing and Materials CNG Compressed Gas Association CMOP Coalbed Methane Outreach Program AZR American Society for Testing and Materials CNG Compressed actural gas AZR American Inc Recycling CO Carbon monoxide CO2 Carbon monoxide CO3 Carbon monoxide CO4 Commerce CO5 Colorado Oil and Gas Conservation Commission BIER Bureau of Economic Analysis, U.S. Department of Commerce CO6CC Colorado Oil and Gas Conservation Contential United States BLM Bureau of Census CRM Component ratio method COB Biological oxygen demand over a 5-day period DD5 Biological oxygen demand over a 5-day period DD5 Biological oxygen demand over a 5-day period Agen demand over a 5-day period Ocean Energy Management CVD Chemical vapor deposition CWNS Clean Watershed Needs Survey Builde energy Management CVD Chemical vapor deposition DE Bureau of Ocean Energy Management DE Digestible energy Digestible energy Digestible energy	AIM Act	American Innovation and Manufacturing Act		
ALU Agriculture and Land Use ANGA American Natural Gas Alliance CEMS Continuous emission monitoring system ANL Argonne National Laboratory APC American Plastics Council API American Petroleum Institute APTA American Petroleum Institute CFR Code of Federal Regulations APTA American Petroleum Institute CFR Code of Federal Regulations CH4 Methane APTA American Public Transportation Association APTA American Public Transportation Association APA IPCC Fourth Assessment Report CHAPA California Health and Productivity Audit AR5 IPCC Fifth Assessment Report CHAPA Combined heat and power CHAPA Combined heat and power CI Confidence interval AR6 IPCC Sixth Assessment Report CI Confidence interval AR7 Advanced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust ASAE American Society of Agricultural Engineers ASAE American Society of Agricultural Engineers ASAE American Society of Agricultural Engineers ASAI American Society for Testing and Materials ASSociation CMM Coal mine methane ASRMA American Society for Testing and Materials AZR American Society for Testing and Materials AZR American Zinc Recycling CO Carbon monoxide COBCC Colorado Oil and Gas Conservation Commission BEA Bureau of Economic Analysis, U.S. Department of Commerce Bureau of Land Management CRM Component ratio method COBCC Colorado Oil and Gas Conservation Commission CRM Component ratio method CRP Conservation Reserve Program CRP Conservation Reserve Program CRP Conservation Reverve Program CRP Conservation Technology Information Center COBCM Carbon Gook Internation Center CND Chemical vapor deposition CHAPA California Health and Productivity Audit CRP Conservation Technology Information Center CND Chemical vapor deposition CHAPA California Health and Productivity Audit CHAPA Califo	AISI	American Iron and Steel Institute	CEAP	
ANGA American Natural Gas Alliance ANL Argonne National Laboratory APC American Plastics Council API American Petroleum Institute API American Petroleum Institute CGA Compressed Gas Association APIA American Public Transportation Association AR4 IPCC Fourth Assessment Report CHAPA California Health and Productivity Audit AR5 IPCC Sixth Assessment Report CI Confidence interval AR6 IPCC Sixth Assessment Report AR7 Autoregressive moving-average CKD Cement kiln dust AUtoregressive moving-average CKD Cement kiln dust ASSOCIATION AMERICAN AMERICAN COMP COalbed Methane Outreach Program CMM Coal mine methane CMOP Coalbed Methane Outreach Program CMA Chemical Market Reporter CMA Chemical Market Reporter CMA Chemical Market Reporter CMR Chemical Market Reporter CMR Chemical Market Reporter CMR Chemical Market Reporter COC Carbon monoxide COMP COGCC Colorado Oil and Gas Conservation Commission DEST Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Land Management CRM Component ratio method DOB Biological oxygen demand OF Component ratio method CRP Conservation Reserve Program CRP Conservation Technology Information Center CVD Chemical vapor deposition CHAPA Carbon Sequestration Rural Appraisals DEM Bureau of Ocean Energy Management CVD Chemical vapor deposition CHAPA Carbon Sequestration Rural Appraisals DEM Bureau of Ocean Energy Management CVD Chemical vapor deposition CHAPA Carbon Sequestration Rural Appraisals DEM Bureau of Ocean Energy Management CVD Chemical vapor dep	ALU	Agriculture and Land Use	CEENA	_
ANL Argone National Laboratory CFC Chlorofluorocarbon APC American Plastics Council CFR Code of Federal Regulations API American Petroleum Institute APTA American Public Transportation Association AR4 IPCC Fourth Assessment Report AR5 IPCC Fifth Assessment Report CH4 CHP Combined heat and power AR6 IPCC Sixth Assessment Report CI Confidence interval AR7 Advanced Resources International CIGRE International Cucific International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust ASAE American Society of Agricultural Engineers ASAE American Society of Agricultural Engineers ASAE Annual Statistical Report ASIRNA American Society for Testing and Materials CMC Confidence interval ASTM American Society for Testing and Materials CMG Coal mine methane ASSOCIATION CMOP Coalbed Methane Outreach Program ASTM American Society for Testing and Materials CNG Compressed hatural gas AZR American Zinc Recycling CO Carbon monoxide BEAE Bureau of Economic Analysis, U.S. Department of CODC Carbon monoxide BEAB Bureau of Economic Analysis, U.S. Department Of Commerce BIER Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Land Management CRF Common Reporting Format BOC Bureau of Census CRF Common Reporting Format BOC Bureau of Census CRF Common Reporting Format BOD Biological oxygen demand over a 5-day period CTIC Conservation Reserve Program BODS Biochemical oxygen demand over a 5-day period CTIC Conservation Reserve Program BOEMB Bureau of Ocean Energy Management CVD Chemical vapor deposition CWNS Clean Watershed Needs Survey Regulation and Enforcement BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition Diameter breast height Diameter breast height Diemeter breast height	ANGA	American Natural Gas Alliance		
APC American Plastics Council CFR Code of Federal Regulations API American Petroleum Institute CGA Compressed Gas Association APTA American Public Transportation Association APTA IPCC Fourth Assessment Report CHAPA California Health and Productivity Audit ARS IPCC Fifth Assessment Report CHP Combined heat and power AR6 IPCC Sixth Assessment Report CI Confidence interval AR1 Advanced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust ARMA Agricultural Resource Management Surveys CLE Crown Light Exposure ASAE American Society of Agricultural Engineers CMA Chemical Manufacturer's Association ASLRRA American Short-line and Regional Railroad CMM Coal mine methane Association CMOP Coalbed Methane Outreach Program ASTM American Society for Testing and Materials CNG Compressed natural gas AZR American Society for Testing and Materials CNG Compressed natural gas AZR American Zinc Recycling CO Carbon monoxide BCEF Biomass conversion and expansion factors CO2 Carbon monoxide BCEF Biomass conversion and expansion factors CO2 Carbon dioxide BLM Bureau of Economic Analysis, U.S. Department of COMUS Continental United States BLM Bureau of Land Management CRF COMUS Continental United States BLM Bureau of Census CRF Common Reporting Format BOC Bureau of Census CRM Carbon Sequestration Rural Appraisals BOB Biological oxygen demand over a 5-day period CTIC Conservation Reserve Program BOD Biological oxygen demand over a 5-day period CTIC Conservation Reserve Program BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEME Bureau of Ocean Energy Management DVD Chemical vapor deposition BOEME Bureau of Ocean Energy Management DVD Diepestible energy BOE Diepestible energy BOE Diepestible energy BOE Diepestible energy BOE Diepestible energy	ANL	Argonne National Laboratory		<u> </u>
APTIAmerican Petroleum InstituteCGACompressed Gas AssociationAPTAAmerican Public Transportation AssociationCH4MethaneAR4IPCC Fourth Assessment ReportCH4PACalifornia Health and Productivity AuditAR5IPCC Fifth Assessment ReportCHPCombined heat and powerAR6IPCC Sixth Assessment ReportCIConfidence intervalAR1Advanced Resources InternationalCIGREInternational Council on Large Electric SystemsARMAAutoregressive moving-averageCKDCement kiln dustARMSAgricultural Resource Management SurveysCLECrown Light ExposureASAEAmerican Society of Agricultural EngineersCMAChemical Manufacturer's AssociationASIRRAAmerican Short-line and Regional Railroad AssociationCMMCoal mine methaneASSOCIATIONCMOPCoalbed Methane Outreach ProgramASTMAmerican Society for Testing and MaterialsCNGCompressed natural gasAZRAmerican Zinc RecyclingCOCarbon monoxideBEABureau of Economic Analysis, U.S. Department of CommerceCO2Carbon monoxideBIERBeverage Industry Environmental Roundtable of CommerceCOGCCColorado Oil and Gas Conservation CommissionBIERBeverage Industry Environmental Roundtable of CommerceCORCCColorado Oil and Gas Conservation CommissionBODBiological oxygen demand periodCRPCommon Reporting FormatBODBiological oxygen demand periodCRPCo	APC	American Plastics Council		
APTAAmerican Public Transportation AssociationCH4MethaneAR4IPCC Fourth Assessment ReportCHAPACalifornia Health and Productivity AuditAR5IPCC Fifth Assessment ReportCHPCombined heat and powerAR6IPCC Sixth Assessment ReportCIConfidence intervalARIAdvanced Resources InternationalCIGREInternational Council on Large Electric SystemsARMAAutoregressive moving-averageCKDCement kiln dustARMSAgricultural Resource Management SurveysCLECrown Light ExposureASAEAmerican Society of Agricultural EngineersCMAChemical Manufacturer's AssociationASLRRAAmerican Short-line and Regional RailroadCMMCoal mine methaneASSOCIATIONCMMPCoalbed Methane Outreach ProgramASTAnnual Statistical ReportCMRChemical Market ReporterASTAmerican Society for Testing and MaterialsCNGCompressed natural gasAZRAmerican Zinc RecyclingCOCarbon monoxideBCEFBiomass conversion and expansion factorsCO2Carbon monoxideBEABureau of Economic Analysis, U.S. Department of CommerceCO0Chemical oxygen demandBLMBureau of Land ManagementCONUSContinental United StatesBLMBureau of CensusCRFCommon Reporting FormatBODBiological oxygen demandCRPConservation Reserve ProgramBODSBiochemical oxygen demand over a 5-day periodCSRACarbon Sequestration	API	American Petroleum Institute		_
AR4 IPCC Fourth Assessment Report CHAPA AR5 IPCC Fifth Assessment Report CHAPA AR6 IPCC Sixth Assessment Report CHP Combined heat and prower AR6 IPCC Sixth Assessment Report CI Confidence interval ARI Advanced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust ARMA Autoregressive moving-average CKD Cement kiln dust ARMA Agricultural Resource Management Surveys CLE Crown Light Exposure ASAE American Society of Agricultural Engineers CMA Chemical Manufacturer's Association ASLRRA American Short-line and Regional Railroad CMM Coal mine methane Association CMOP Coalbed Methane Outreach Program ASTM American Society for Testing and Materials CNG Compressed natural gas AZR American Zinc Recycling CO Carbon monoxide BCEF Biomass conversion and expansion factors CO2 Carbon dioxide BCEF Biomass conversion and expansion factors CO3 Carbon dioxide BCEF Biomass conversion and expansion factors CO4 Commerce CO5 CC2 Colorado Oil and Gas Conservation Commission BLM Bureau of Economic Analysis, U.S. Department of COMUS Continental United States BLM Bureau of Census CRM Component ratio method BOD Biological oxygen demand CRP Conservation Reserve Program BOD Biological oxygen demand CRP Conservation Reserve Program BOD5 Biochemical oxygen demand over a 5-day period CTIC Conservation Rural Appraisals CTIC Conservation Technology Information Center BOEMB Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMB Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMB Bureau of Ocean Energy Management DE Digestible energy	APTA	American Public Transportation Association		
AR5 IPCC Fifth Assessment Report AR6 IPCC Sixth Assessment Report ARI Advanced Resources International CIGRE International Council on Large Electric Systems ARIMA Autoregressive moving-average CKD Cement kiln dust C	AR4		· ·	
ARIO Advanced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust ARIO Agricultural Resource Management Surveys ARMS Agricultural Resource Management Surveys ASAE American Society of Agricultural Engineers ASAE American Short-line and Regional Railroad Association AMERICAN SOCIETY FOR TESTING and Materials ACR American Society for Testing and Materials ACR American Zinc Recycling CO Carbon monoxide CMM Coalmine methane COD Chemical Market Reporter CMG Compressed natural gas CO Carbon monoxide COD Chemical Oxygen demand Of Commerce BIER Bureau of Economic Analysis, U.S. Department Of Commerce COGCC Colorado Oil and Gas Conservation Commission BIER Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Land Management CRF Common Reporting Format CRF Common Reporting Format CRF Common Reporting Format CRF Component ratio method CRP Conservation Reserve Program BOD Biochemical oxygen demand over a 5-day period CTIC Conservation Technology Information Center CVD Chemical vapor deposition CWNS Clean Watershed Needs Survey Regulation and Enforcement CWN Clean Watershed Needs Survey Dienestible energy Diesetible energy Diesetible energy	AR5	IPCC Fifth Assessment Report		•
ARI Advanced Resources International CIGRE International Council on Large Electric Systems ARMA Autoregressive moving-average CKD Cement kiln dust ARMS Agricultural Resource Management Surveys ASAE American Society of Agricultural Engineers CMA Chemical Manufacturer's Association ASLRRA American Short-line and Regional Railroad CMM Coal mine methane Association CMOP Coalbed Methane Outreach Program ASR Annual Statistical Report CMR Chemical Market Reporter ASTM American Society for Testing and Materials CNG Compressed natural gas AZR American Zinc Recycling CO Carbon monoxide BEEF Biomass conversion and expansion factors CO2 Carbon dioxide BEA Bureau of Economic Analysis, U.S. Department of Commerce COGCC Colorado Oil and Gas Conservation Commission BIER Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Census CRF Common Reporting Format BOC Bureau of Census CRF Common Reserve Program BOD Biological oxygen demand CRP Conservation Reserve Program BOD Biochemical oxygen demand over a 5-day period CTIC Conservation Technology Information Center BOEMRE Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement Ab. b. Diameter breast height BOE Digestible energy	AR6	IPCC Sixth Assessment Report		•
ARMA Autoregressive moving-average CKD Cement kiln dust ARMS Agricultural Resource Management Surveys ASAE American Society of Agricultural Engineers ASLRRA American Short-line and Regional Railroad ASSURAN American Short-line and Regional Railroad ASSOCIATION ASSOCIATION ASSOCIATION ASSOCIATION ASSOCIATION ASTM American Society for Testing and Materials AZR American Society for Testing and Materials CNG Compressed natural gas AZR American Zinc Recycling CO Carbon monoxide BCEF Biomass conversion and expansion factors CO2 Carbon monoxide BEA Bureau of Economic Analysis, U.S. Department of Commerce COGCC Colorado Oil and Gas Conservation Commission BIER Beverage Industry Environmental Roundtable BLM Bureau of Land Management CRF Common Reporting Format BOC Bureau of Census BOD Biological oxygen demand CRP Conservation Reserve Program BOD Biochemical oxygen demand over a 5-day period BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management BOEM Bureau of Ocean Energ	ARI	Advanced Resources International		
ARMS Agricultural Resource Management Surveys ASAE American Society of Agricultural Engineers ASLRRA American Short-line and Regional Railroad Association ASCASC Annual Statistical Report ASTM American Society for Testing and Materials ASTM American Society for Testing and Materials ASTM American Zinc Recycling BCEF Biomass conversion and expansion factors BEA Bureau of Economic Analysis, U.S. Department of Commerce BIER Beverage Industry Environmental Roundtable BLM Bureau of Land Management BCC Bureau of Census BCC Common Reporting Format BCC Bureau of Census BCR Component ratio method BCR Conservation Reserve Program BCC CORP Conservation Reserve Program BCC CORP Conservation Reserve Program BCC CORP Conservation Technology Information Center BCC CORP Conservation Pural Appraisals BCC CORP Conservation Technology Information Center BCC CORP Conservation Technology Information Center BCC CORP Conservation Pural Appraisals BCC CORP CORP CORP CORP CORP CORP CORP CO	ARMA	Autoregressive moving-average		
ASAE American Society of Agricultural Engineers ASLRRA American Short-line and Regional Railroad Association ASR Annual Statistical Report ASTM American Society for Testing and Materials AZR American Zinc Recycling BCEF Biomass conversion and expansion factors BEA Bureau of Economic Analysis, U.S. Department of Commerce BIER Beverage Industry Environmental Roundtable BLM Bureau of Census BOD Biological oxygen demand BOEM Bureau of Ocean Energy Management BOEM Bureau of Ocean Energy Management, Regulation and Enforcement BOF Basic oxygen furnace CMM Commical Manufacturer's Association CMM Coal mine methane COMM Coal mine methane COMM Coalbed Methane Outreach Program COMP Coalbed Methane Outreach Program COMP Compressed natural gas CO Carbon monoxide COD Carbon monoxide COD Chemical oxygen demand COD Chemical oxygen demand COD Colorado Oil and Gas Conservation Commission COD Continental United States CONUS Continental United States CONUS Continental United States COMMON Reporting Format CRM Component ratio method CRP Conservation Reserve Program CORP Conservation Reserve Program CORP Conservation Rural Appraisals CORP Conservation Technology Information Center CVD Chemical vapor deposition CVD Chemical vapor deposition Diameter breast height Diestible energy	ARMS	Agricultural Resource Management Surveys		
ASLRRA American Short-line and Regional Railroad Association CMOP Coalbed Methane Outreach Program ASR Annual Statistical Report CMR Chemical Market Reporter ASTM American Society for Testing and Materials CNG Compressed natural gas AZR American Zinc Recycling CO Carbon monoxide BCEF Biomass conversion and expansion factors CO2 Carbon dioxide BEA Bureau of Economic Analysis, U.S. Department of Commerce COGCC Colorado Oil and Gas Conservation Commission BIER Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Land Management CRF Common Reporting Format BOC Bureau of Census CRM Component ratio method BOD Biological oxygen demand CRP Conservation Reserve Program BODS Biochemical oxygen demand over a 5-day period CTIC Conservation Rural Appraisals BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement Alb.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy BOE Digestible energy CMA Component ratio method CRP Conservation Reserve Program CTIC Conservation Technology Information Center	ASAE	American Society of Agricultural Engineers		
ASSOCIATION ASR Annual Statistical Report ASTM American Society for Testing and Materials AZR American Zinc Recycling BCEF Biomass conversion and expansion factors BEA Bureau of Economic Analysis, U.S. Department of Commerce BIER Beverage Industry Environmental Roundtable BLM Bureau of Land Management BOC Bureau of Census BOD Biological oxygen demand BOD Biological oxygen demand BOD Biological oxygen demand over a 5-day period BOEM Bureau of Ocean Energy Management BOEM Basic oxygen furnace BOEM Basic oxygen furnace CMOP Coarbon monoxide COD Carbon monoxide COD Chemical oxygen demand COD Chemical oxygen demand COD Chemical oxygen demand COD Chemical oxygen demand COD Continental United States CRF Common Reporting Format CRM Component ratio method CRP Conservation Reserve Program CORP Conservation Reserve Program CORP Conservation Reserve Program CODE CONSERVATION Reverse Program COD Chemical vapor deposition	ASLRRA	American Short-line and Regional Railroad		
ASR Annual Statistical Report ASTM American Society for Testing and Materials AZR American Zinc Recycling BCEF Biomass conversion and expansion factors BEA Bureau of Economic Analysis, U.S. Department of Commerce BIER Beverage Industry Environmental Roundtable BLM Bureau of Land Management BOC Bureau of Census BOD Biological oxygen demand BOD5 Biochemical oxygen demand over a 5-day period BUF		Association		
ASTM American Society for Testing and Materials AZR American Zinc Recycling BCEF Biomass conversion and expansion factors BEA Bureau of Economic Analysis, U.S. Department of Commerce BIER Beverage Industry Environmental Roundtable BLM Bureau of Land Management BoC Bureau of Census BOD Biological oxygen demand BOD5 Biochemical oxygen demand over a 5-day period BOEM Bureau of Ocean Energy Management BOEM Bureau of Ocean Energy Management, Regulation and Enforcement BOF Basic oxygen furnace CNGC Colorado Oil and Gas Conservation Commission CONUS Continental United States CRF Common Reporting Format CRM Component ratio method CRP Conservation Reserve Program CSRA Carbon Sequestration Rural Appraisals CTIC Conservation Technology Information Center CWNS Clean Watershed Needs Survey Digestible energy Digestible energy Digestible energy	ASR	Annual Statistical Report		_
AZR American Zinc Recycling BCEF Biomass conversion and expansion factors BEA Bureau of Economic Analysis, U.S. Department of Commerce BIER Beverage Industry Environmental Roundtable BLM Bureau of Land Management BoC Bureau of Census BOD Biological oxygen demand BOD Biochemical oxygen demand over a 5-day period BOEM Bureau of Ocean Energy Management BOEM Bureau of Ocean Energy Management BOEM Bureau of Ocean Energy Management BOF Basic oxygen furnace COD Chemical oxygen demand COD Chemical oxygen demand COD Chemical oxygen demand COD Chemical oxygen demand COD Colorado Oil and Gas Conservation Commission CONUS Continental United States CONUS Continental United States CONUS Continental United States CONUS Conservation Reporting Format COD CONUS CONTINENTAL OTHER CONTINENTAL O	ASTM	American Society for Testing and Materials		·
BECF Biomass conversion and expansion factors BEA Bureau of Economic Analysis, U.S. Department of Commerce COGCC Colorado Oil and Gas Conservation Commission BIER Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Land Management CRF Common Reporting Format BOC Bureau of Census CRM Component ratio method BOD Biological oxygen demand CRP Conservation Reserve Program BOD Biochemical oxygen demand Over a 5-day period CTIC Conservation Technology Information Center BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	AZR	American Zinc Recycling		
BEA Bureau of Economic Analysis, U.S. Department of Commerce COGCC Colorado Oil and Gas Conservation Commission BIER Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Land Management CRF Common Reporting Format BoC Bureau of Census CRM Component ratio method BOD Biological oxygen demand CRP Conservation Reserve Program BOD5 Biochemical oxygen demand over a 5-day period CTIC Conservation Technology Information Center BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BCEF	Biomass conversion and expansion factors		
BIER Beverage Industry Environmental Roundtable CONUS Continental United States BLM Bureau of Land Management CRF Common Reporting Format BoC Bureau of Census CRM Component ratio method BOD Biological oxygen demand CRP Conservation Reserve Program BOD5 Biochemical oxygen demand over a 5-day period CTIC Conservation Technology Information Center BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BEA	Bureau of Economic Analysis, U.S. Department		
BIER Beverage Industry Environmental Roundtable BLM Bureau of Land Management BoC Bureau of Census BOD Biological oxygen demand BOD Biochemical oxygen demand over a 5-day period BOEM Bureau of Ocean Energy Management BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement BOF Basic oxygen furnace CONUS Continental United States CONUS CORF Common Reporting Format CRP Component ratio method CRP Conservation Reserve Program CSRA Carbon Sequestration Rural Appraisals CTIC Conservation Technology Information Center CVD Chemical vapor deposition CWNS Clean Watershed Needs Survey Digestible energy BOF Digestible energy		of Commerce		· -
BLM Bureau of Land Management BoC Bureau of Census BOD Biological oxygen demand BOD5 Biochemical oxygen demand over a 5-day period BOEM Bureau of Ocean Energy Management BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement BOF Basic oxygen furnace CRP Conservation Reserve Program CSRA Carbon Sequestration Rural Appraisals CTIC Conservation Technology Information Center CVD Chemical vapor deposition CWNS Clean Watershed Needs Survey d.b.h Diameter breast height DE Digestible energy	BIER	Beverage Industry Environmental Roundtable		
BoC Bureau of Census CRM Component ratio method BOD Biological oxygen demand CRP Conservation Reserve Program BOD5 Biochemical oxygen demand over a 5-day period CTIC Conservation Technology Information Center BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, CWNS Clean Watershed Needs Survey Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BLM	Bureau of Land Management		
BOD Biological oxygen demand CRP Conservation Reserve Program BOD5 Biochemical oxygen demand over a 5-day period CTIC Conservation Technology Information Center BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BoC	Bureau of Census		
BOD5 Biochemical oxygen demand over a 5-day period CTIC Conservation Rural Appraisals BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BOD	Biological oxygen demand		•
BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, CWNS Clean Watershed Needs Survey Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BOD5	Biochemical oxygen demand over a 5-day		
BOEM Bureau of Ocean Energy Management CVD Chemical vapor deposition BOEMRE Bureau of Ocean Energy Management, CWNS Clean Watershed Needs Survey Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy		period		
BOEMRE Bureau of Ocean Energy Management, CWNS Clean Watershed Needs Survey Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BOEM	Bureau of Ocean Energy Management		
Regulation and Enforcement d.b.h Diameter breast height BOF Basic oxygen furnace DE Digestible energy	BOEMRE	Bureau of Ocean Energy Management,		
BOF Basic oxygen furnace DE Digestible energy		Regulation and Enforcement		
BRS Biennial Reporting System	BOF	Basic oxygen furnace		
	BRS	Biennial Reporting System		G

DESC	Defense Energy Support Center-DoD's Defense	g	Gram
	Logistics Agency	G&B	Gathering and boosting
DFAMS	Defense Fuels Automated Management System	GaAs	Gallium arsenide
DGGS	Division of Geological & Geophysical Surveys	GCV	Gross calorific value
DHS	Department of Homeland Security	GDP	Gross domestic product
DLA	DoD's Defense Logistics Agency	GEI	Gulfwide Emissions Inventory
DM	Dry matter	GHG	Greenhouse gas
DOC	Degradable organic carbon	GHGRP	EPA's Greenhouse Gas Reporting Program
DOC	U.S. Department of Commerce	GIS	Geographic Information Systems
DoD	U.S. Department of Defense	GJ	Gigajoule
DOE	U.S. Department of Energy	GOADS	Gulf Offshore Activity Data System
DOI	U.S. Department of the Interior	GOM	Gulf of Mexico
DOM	Dead organic matter	GPG	Good Practice Guidance
DOT	U.S. Department of Transportation	GRI	Gas Research Institute
DRE	Destruction or removal efficiencies	GSAM	Gas Systems Analysis Model
DRI	Direct Reduced Iron	GTI	Gas Technology Institute
EAF	Electric arc furnace	GWP	Global warming potential
EDB	Aircraft Engine Emissions Databank	ha	Hectare
EDF	Environmental Defense Fund	HBFC	Hydrobromofluorocarbon
EER	Energy economy ratio	HC	Hydrocarbon
EF	Emission factor	HCFC	Hydrochlorofluorocarbon
EFMA	European Fertilizer Manufacturers Association	HCFO	Hydrochlorofluoroolefin
EJ	Exajoule	HDDV	Heavy duty diesel vehicle
EGR	Exhaust gas recirculation	HDGV	Heavy duty gas vehicle
EGU	Electric generating unit	HDPE	High density polyethylene
EIA	Energy Information Administration, U.S.	HF	Hydraulically fractured
	Department of Energy	HFC	Hydrofluorocarbon
EIIP	Emissions Inventory Improvement Program	HFO	Hydrofluoroolefin
EOR	Enhanced oil recovery	HFE	Hydrofluoroether
EPA	U.S. Environmental Protection Agency	HHV	Higher Heating Value
EREF	Environment Research & Education Foundation	HMA	Hot Mix Asphalt
ERS	Economic Research Service	HMIWI	Hospital/medical/infectious waste incinerator
ETMS	Enhanced Traffic Management System	HTF	Heat Transfer Fluid
EV	Electric vehicle	HTS	Harmonized Tariff Schedule
EVI	Enhanced Vegetation Index	HVAE	High Voltage Anode Effects
FAA	Federal Aviation Administration	HWP	Harvested wood product
FAO	Food and Agricultural Organization	IBF	International bunker fuels
FAOSTAT	Food and Agricultural Organization database	IC	Integrated Circuit
FAS	Fuels Automated System	ICAO	International Civil Aviation Organization
FCCC	Framework Convention on Climate Change	ICBA	International Carbon Black Association
FEB	Fiber Economics Bureau	ICE	Internal combustion engine
FEMA	Federal Emergency Management Agency	ICR	Information Collection Request
FERC	Federal Energy Regulatory Commission	IEA	International Energy Agency
FGD	Flue gas desulfurization	IFO	Intermediate Fuel Oil
FHWA	Federal Highway Administration	IGES	Institute of Global Environmental Strategies
FIA	Forest Inventory and Analysis	IISRP	International Institute of Synthetic Rubber
FIADB	Forest Inventory and Analysis Database		Products
FIPR	Florida Institute of Phosphate Research	ILENR	Illinois Department of Energy and Natural
FOD	First order decay		Resources
FOEN	Federal Office for the Environment	IMO	International Maritime Organization
FOKS	Fuel Oil and Kerosene Sales	IPAA	Independent Petroleum Association of America
FQSV	First-quarter of silicon volume	IPCC	Intergovernmental Panel on Climate Change
FSA	Farm Service Agency	IPPU	Industrial Processes and Product Use
FTP	Federal Test Procedure	ITC	U.S. International Trade Commission

ITRS	International Technology Roadmap for	MRLC	Multi-Resolution Land Characteristics
	Semiconductors		Consortium
JWR	Jim Walters Resources	MRV	Monitoring, reporting, and verification
KCA	Key category analysis	MSHA	Mine Safety and Health Administration
kg	Kilogram	MSW	Municipal solid waste
kt	Kiloton	MT	Metric ton
kWh	Kilowatt hour	MTBE	Methyl Tertiary Butyl Ether
LDPE	Low density polyethylene	MTBS	Monitoring Trends in Burn Severity
LDT	Light-duty truck	MVAC	Motor vehicle air conditioning
LDV	Light-duty vehicle	MY	Model year
LEV	Low emission vehicles	N_2O	Nitrous oxide
LFG	Landfill gas	NA	Not applicable; Not available
LFGTE	Landfill gas-to-energy	NACWA	National Association of Clean Water Agencies
LHV	Lower Heating Value	NAHMS	National Animal Health Monitoring System
LKD	Lime kiln dust	NAICS	North American Industry Classification System
LLDPE	Linear low density polyethylene	NAPAP	National Acid Precipitation and Assessment
LMOP	EPA's Landfill Methane Outreach Program		Program
LNG	Liquefied natural gas	NARR	North American Regional Reanalysis Product
LPG	Liquefied petroleum gas(es)	NAS	National Academies of Sciences, Engineering,
LTO	Landing and take-off		and Medicine
LULUCF	Land Use, Land-Use Change, and Forestry	NASA	National Aeronautics and Space Administration
LVAE	Low Voltage Anode Effects	NASF	National Association of State Foresters
M&R	Metering and regulating	NASS	USDA's National Agriculture Statistics Service
MARPOL	International Convention for the Prevention of	NC	No change
	Pollution from Ships	NCASI	National Council of Air and Stream
MC	Motorcycle		Improvement
MCF	Methane conversion factor	NCV	Net calorific value
MCL	Maximum Contaminant Levels	ND	No data
MCFD	Thousand cubic feet per day	NE	Not estimated
MDI	Metered dose inhalers	NEH	National Engineering Handbook
MDP	Management and design practices	NEI	National Emissions Inventory
MECS	EIA Manufacturer's Energy Consumption Survey	NEMA	National Electrical Manufacturers Association
MEMS	Micro-electromechanical systems	NEMS	National Energy Modeling System
MER	Monthly Energy Review	NESHAP	National Emission Standards for Hazardous Air
MGO	Marine gas oil	112311711	Pollutants
MgO	Magnesium oxide	NEU	Non-Energy Use
MJ	Megajoule	NEV	Neighborhood Electric Vehicle
MLRA	Major Land Resource Area	NF ₃	Nitrogen trifluoride
mm	Millimeter	NFI	National forest inventory
MMBtu	Million British thermal units	NGL	Natural gas liquids
MMCF	Million cubic feet	NID	National inventory of Dams
MMCFD	Million cubic feet per day	NIR	National Inventory Report
MMS	Minerals Management Service	NLA	National Lime Association
MMT	Million metric tons	NLCD	National Land Cover Dataset
MMTCE		NMOC	
	Million metric tons carbon equivalent	NMVOC	Non-methane organic compounds
MMT CO ₂	Million metric tons carbon dioxide equivalent		Non-methane volatile organic compound
Eq. MODIS	Madarata Pasalutian Imaging	NMOG	Non-methane organic gas
MIODIS	Moderate Resolution Imaging	NO	Not occurring
	Spectroradiometer	NO ₂	Nitrogen dioxide
MoU	Memorandum of Understanding	NO _x	Nitrogen oxides
MOVES	U.S. EPA's Motor Vehicle Emission Simulator	NOAA	National Oceanic and Atmospheric
1400	model	NG-	Administration
MPG	Miles per gallon	NOF	Not on feed
		NPDES	National Pollutant Discharge Elimination System

NPP	Net primary productivity	PU	Polyurethane
NPRA	National Petroleum and Refiners Association	PVC	Polyvinyl chloride
NRBP	Northeast Regional Biomass Program	PV	Photovoltaic
NRC	National Research Council	QA/QC	Quality Assurance and Quality Control
NRCS	Natural Resources Conservation Service	QBtu	Quadrillion Btu
NREL	National Renewable Energy Laboratory	R&D	Research and Development
NRI	National Resources Inventory	RECs	Reduced Emissions Completions
NSCEP	National Service Center for Environmental	RCRA	Resource Conservation and Recovery Act
NSCLF	Publications	RFA	Renewable Fuels Association
NSCR	Non-selective catalytic reduction	RFS	Renewable Fuel Standard
NSPS	•		Rubber Manufacturers' Association
NWS	New source performance standards National Weather Service	RMA RPA	Resources Planning Act
OAG	Official Airline Guide	RTO	<u> </u>
			Regression-through-the-origin
OAP	EPA Office of Atmospheric Programs	SAE	Society of Automotive Engineers
OAQPS	EPA Office of Air Quality Planning and Standards	SAGE	System for assessing Aviation's Global Emissions
ODP	Ozone depleting potential	SAIC	Science Applications International Corporation
ODS	Ozone depleting substances	SAN	Styrene Acrylonitrile
OECD	Organization of Economic Co-operation and	SAR	IPCC Second Assessment Report
	Development	SCR	Selective catalytic reduction
OEM	Original equipment manufacturers	SCSE	South central and southeastern coastal
OGJ	Oil & Gas Journal	SDR	Steel dust recycling
OGOR	Oil and Gas Operations Reports	SEC	Securities and Exchange Commission
OH	Hydroxyl radical	SEMI	Semiconductor Equipment and Materials
OMS	EPA Office of Mobile Sources	_	Industry
ORNL	Oak Ridge National Laboratory	SF ₆	Sulfur hexafluoride
OSHA	Occupational Safety and Health Administration	SIA	Semiconductor Industry Association
OTA	Office of Technology Assessment	SiC	Silicon carbide
OTAQ	EPA Office of Transportation and Air Quality	SICAS	Semiconductor International Capacity Statistics
OVS	Offset verification statement	SNAP	Significant New Alternative Policy Program
PADUS	Protected Areas Database of the United States	SNG	Synthetic natural gas
PAH	Polycyclic aromatic hydrocarbons	SO_2	Sulfur dioxide
PCA	Portland Cement Association	SOC	Soil Organic Carbon
PCC	Precipitate calcium carbonate	SOG	State of Garbage survey
PDF	Probability Density Function	SOHIO	Standard Oil Company of Ohio
PECVD	Plasma enhanced chemical vapor deposition	SSURGO	Soil Survey Geographic Database
PET	Polyethylene terephthalate	STMC	Scrap Tire Management Council
PET	Potential evapotranspiration	SULEV	Super Ultra Low Emissions Vehicle
PEVM	PFC Emissions Vintage Model	SWANA	Solid Waste Association of North America
PFC	Perfluorocarbon	SWDS	Solid waste disposal sites
PFPE	Perfluoropolyether	SWICS	Solid Waste Industry for Climate Solutions
PHEV	Plug-in hybrid vehicles	TA	Treated anaerobically (wastewater)
PHMSA	Pipeline and Hazardous Materials Safety	TAM	Typical animal mass
	Administration	TAME	Tertiary amyl methyl ether
PI	Productivity index	TAR	IPCC Third Assessment Report
PLS	Pregnant liquor solution	TBtu	Trillion Btu
POTW	Publicly Owned Treatment Works	TDN	Total digestible nutrients
ppbv	Parts per billion (109) by volume	TEDB	Transportation Energy Data Book
ppm	Parts per million	TFI	The Fertilizer Institute
ppmv	Parts per million (106) by volume	TIGER	Topologically Integrated Geographic Encoding
pptv	Parts per trillion (10 ¹²) by volume		and Referencing survey
PRCI	Pipeline Research Council International	TJ	Terajoule
PRP	Pasture/Range/Paddock	TLEV	Traditional low emissions vehicle
PS	Polystyrene	TMLA	Total Manufactured Layer Area
PSU	Primary Sample Unit	TOW	Total organics in wastewater
	•		ŭ

TPO	Timber Product Output	VAIP	EPA's Voluntary Aluminum Industrial
TRI	Toxic Release Inventory		Partnership
TSDF	Hazardous waste treatment, storage, and	VAM	Ventilation air methane
	disposal facility	VKT	Vehicle kilometers traveled
TTB	Tax and Trade Bureau	VMT	Vehicle miles traveled
TVA	Tennessee Valley Authority	VOCs	Volatile organic compounds
UAN	Urea ammonium nitrate	VS	Volatile solids
UDI	Utility Data Institute	WBJ	Waste Business Journal
UFORE	U.S. Forest Service's Urban Forest Effects model	WEF	Water Environment Federation
UG	Underground (coal mining)	WERF	Water Environment Research Federation
U.S.	United States		World Fab Forecast (previously WFW, World
U.S. ITC	United States International Trade Commission		Fab Watch)
UEP	United Egg Producers	WGC	World Gas Conference
ULEV	Ultra low emission vehicle	WIP	Waste-in-place
UNEP	United Nations Environmental Programme	WMO	World Meteorological Organization
UNFCCC	United Nations Framework Convention on	WMS	Waste management systems
	Climate Change	WRRF	Water resource recovery facilities
USAA	U.S. Aluminum Association	WTE	Waste-to-energy
USAF	United States Air Force	WW	Wastewater
USDA	United States Department of Agriculture	WWTP	Wastewater treatment plant
USFS	United States Forest Service	ZEVs	Zero emissions vehicles
USGS	United States Geological Survey		
USITC	U.S. International Trade Commission		

Document 15-20 Filed 01/31/24

Page 915 of 1050

PageID 4363

DECEMBER 13, 2021

FACT SHEET: The Biden-Harris Electric Vehicle Charging Action Plan

Vice President Kamala Harris to Announce Action Plan that Fast Tracks Bipartisan Infrastructure Law Investments

President Biden has united automakers and autoworkers to drive American leadership forward on clean cars, and he set an ambitious target of 50% of electric vehicle (EV) sale shares in the U.S. by 2030. Now, the Bipartisan Infrastructure Law will supercharge America's efforts to lead the electric future, Building a Better America where we can strengthen domestic supply chains, outcompete the world, and make electric cars cheaper for working families

President Biden, American families, automakers, and autoworkers agree: the future of transportation is electric. The electric car future is cleaner, more equitable, more affordable, and an economic opportunity to support goodpaying, union jobs across American supply chains as automakers continue investing in manufacturing clean vehicles and the batteries that power them.

Today, the Biden-Harris-Administration is releasing an EV Charging Action Plan to outline steps federal agencies are taking to support developing and deploying chargers in American communities across the country. As a result of the Bipartisan Infrastructure Law, the Department of Energy (DOE) and Department of Transportation (DOT) will establish a Joint Office of Energy and Transportation focused on deploying EV infrastructure, working hand-in-hand to collect input and guidance from industry leaders, manufacturers, workers, and other stakeholders that will ensure the national network provides convenient charging for all. The initial focus will be building a convenient, reliable public charging network that can build public confidence, with a focus on filling gaps in rural, disadvantaged, and hard-to-reach locations.

investment in electric vehicle charging in U.S. history that will put us on the path to a convenient and equitable network of 500,000 chargers and make EVs accessible to all Americas for both local and long-distance trips. The Bipartisan Infrastructure Law includes \$5 billion in formula funding for states with a goal to build a national charging network. 10% is set-aside each year for the Secretary to provide grants to States to help fill gaps in the network. The Law also provides \$2.5 billion for communities and corridors through a competitive grant program that will support innovative approaches and ensure that charger deployment meets Administration priorities such as supporting rural charging, improving local air quality and increasing EV charging access in disadvantaged communities. Together, this is the largest-ever U.S. investment in EV charging and will be a transformative down payment on the transition to a zero-emission future.

With the historic investments in the Bipartisan Infrastructure Law, the Biden-Harris Administration is laying the foundation for a nationwide network of EV charging infrastructure to provide a reliable, affordable, convenient, seamless user experience that is equitable and accessible for all Americans. This network will enable:

- An accelerated adoption of electric vehicles for all private consumers and commercial fleets, including those who cannot reliably charge at their home that can improve our air quality, reduce emissions, put us on a path to net-zero emissions by no later than 2050, and position U.S. industries to lead global efforts.
- Targeted equity benefits for disadvantaged communities, reducing mobility and energy burdens while also creating jobs and supporting businesses.
- Create family-sustaining union jobs that can't be outsourced.

Electric Vehicle Infrastructure

Today, the Biden-Harris Administration is announcing the following actions:

Energy Secretary Jennifer Granholm and Transportation Secretary Pete Buttigieg will sign an agreement enabling them to leverage the best resources, talent, and experience at the DOT and the DOE, including the DOE's National Labs. The Joint Office will ensure the agencies can work together to implement the EV charging network and other electrification provisions in the Bipartisan Infrastructure Law. This will provide states, communities, industry, labor, and consumer groups with a coordinated Federal approach and a "one-stop-shop" for resources on EV Charging and related topics. The agencies will complete a Memorandum of Understanding on December 14th to formally launch the Joint Office.

- Gathering Diverse Stakeholder Input: The White House is convening a series of initial stakeholder meetings on topics including partnerships with state and local government, domestic manufacturing, equity and environmental justice, civil rights, partnering with tribal communities, and maximizing environmental benefits. DOT and DOE will also launch a new Advisory Committee on Electric Vehicles and is targeting to appoint members to this committee by the end of the first quarter of 2022. DOT released an updated guide to deploying EV Charging in highway right-ofway in response to stakeholder interest. To gather input from the widest possible array of stakeholders, DOT has a new EV Charging Request for Information, where stakeholders can submit their priorities for Federal standards and guidance for consideration.
- Preparing to Issue Guidance and Standards for States and Cities: The Administration is already hard at work developing the guidance and standards described in the Bipartisan Infrastructure Law. No later than February 11th, DOT will publish guidance for States and cities to strategically deploy EV charging stations to build out a national network along our nation's highway system. This guidance will look at where we already have EV charging and where we need—or will need—more of it. It will focus on the needs of disadvantaged and rural communities, catalyze further private investment in EV charging, and ensure we're smartly connecting to our electric grid. No later than May 13th, DOT will publish standards for EV chargers in the national network to ensure they work, they're safe, and they're accessible to everyone.

- manufacturing, assembly, installation, and maintenance all have the potential to not only support our sustainability and climate goals, but also to drive domestic competitiveness and create good-paying, union jobs in the United States. To ensure this network of EV chargers can be built in America, by America, DOT and DOE are working directly with manufacturers, automakers and labor to understand what domestic sourcing is available today, and what may be possible in the future. In November, DOT and DOE released a request for information from domestic manufacturers to identify EV chargers and other charging related components that meet USDOT Buy America requirements and to highlight the benefits of shifting all manufacturing and assembly processes to the United States.
- New Solicitation for Alternative Fuel Corridors: Today, the DOT is announcing a forthcoming solicitation for the 6th round of Alternative Fuel Corridors designations. This program, created by the FAST Act in 2015, recognizes highway segments that have infrastructure plans to allow travel on alternative fuels, including electricity. FHWA will establish a recurring process to regularly update these corridors.

The current network of over 100,000 public chargers operates with different plug types, payment options, data availability, and hardware hookups.

Today's actions will establish a more uniform approach, provide greater convenience for customers, and offer increased confidence for industry.

These federal programs will spur additional private sector investments and drive the build-out of a user-friendly, cost-effective, and financially sustainable national network creating well-paying jobs across manufacturing, installation, and operation. A ubiquitous charging infrastructure targeted to meet different consumers' needs will provide equitable benefits to all Americans and provide flexibility for future investments, effective integration with a clean power system, and support a growing and diversifying fleet of electrified vehicles.

Electric Vehicle Batteries

Another key component of our electric vehicle strategy is to increase domestic manufacturing of EV batteries and components and advance environmentally responsible domestic sourcing and recycling of critical In June, the Biden-Harris Administration released 100-day reviews of the supply chains of four critical products, including high-capacity batteries and critical minerals and materials. The reviews made dozens of recommendations across Federal agencies securing a reliable and sustainable end-to-end domestic supply chain for advanced batteries. These recommendations include supporting sustainable and responsible domestic mining and processing of key battery minerals, such as lithium, cobalt, and nickel, and ensuring new domestic automotive battery production adheres to high-road labor standards.

- The Federal Consortium for Advanced Batteries released the National Blueprint for Lithium Batteries, codifying the findings of the battery supply chain review in a 10-year, whole-of-government plan to urgently develop a domestic lithium battery supply chain that combats the climate crisis by creating good-paying clean energy jobs across America.
- The DOE Loan Programs Office (LPO) published new guidance and a fact sheet for the approximately \$17 billion in loan authority in the Advanced Technology Vehicles Manufacturing Loan Program (ATVM) to support the domestic battery supply chain. LPO will leverage full statutory authority to finance key strategic areas of development and fill deficits in the domestic supply chain capacity. This will include the ATVM program making loans to manufacturers of advanced technology vehicle battery cells and packs for re-equipping, expanding or establishing such manufacturing facilities in the United States.
- DOE's Federal Energy Management Program (FEMP) launched a new effort to support deployment of energy storage projects by federal agencies, including a federal government-wide energy storage review that will evaluate the current opportunity for deploying battery storage at federal sites and a call for projects from federal sites interested in deploying energy storage projects. These actions build on steps taken earlier this year to leverage \$13 million in FEMP's Assisting Federal Facilities with Energy Conservation Technologies grants to unlock an estimated \$260 million or more in project investments, including battery storage projects.

working and industry is ready to step up. For example, Lithium is a critical input to batteries where the United States currently has very little domestic supply. The Biden Administration has funded two dozen teams to expand sourcing of lithium from geothermal brines and approved a permit for the Nevada-based Thacker Pass lithium mine. Automakers area also signing contracts that leverage domestic supply, including Ford sourcing lithium from recycled content through Redwood Materials, GM sourcing lithium from geothermal brines in the Salton Sea with Controlled Thermal Resources, and Tesla sourcing lithium from a Piedmont project in North Carolina.

The investments proposed by the Biden Administration will accelerate and amplify this progress. The Bipartisan Infrastructure Law includes more than \$7 billion in funding to accelerate innovations and facilities across the battery supply chain from battery materials refining, processing and manufacturing to battery manufacturing, including components, to battery recycling and reuse. These investments will support the development of a North American battery supply chain, help expand manufacturing and recycling facilities in the United States and substantially advance the battery recycling through research, development and demonstration projects in collaboration with retailers as well as state and local governments.

The Bipartisan Infrastructure Law includes:

- **\$3 billion** in competitive grants for battery minerals and refined materials aimed at accelerating the development of the North American battery supply chain.
- An additional \$3 billion for competitive grants aimed at building, retooling, or expanding manufacturing of batteries and battery components (such as cathodes, anodes, and electrolytes), and to establish recycling facilities in the United States.
- Recognizing the need for innovative and practical approaches to battery
 and critical mineral recycling, the act includes research, development,
 and demonstration recycling projects (\$60 million) and efforts in
 cooperation with retailers (\$15 million) and state and local governments
 (\$50 million) to increase the collection of spent batteries for reuse,

- and second-life applications program (\$200 million) is focused on making electric vehicles batteries (e.g., optimized designs) easier to recycle and utilize in secondary applications before recycling.
- An additional \$750 million "Advanced Energy Manufacturing and Recycling Grant Program" to re-equip, expand or establish an industrial or manufacturing facility to reduce GHG emissions of that facility substantially below current best practices.

###



Home / Newsroom

IN THIS SECTION

Related Links

• GHG Emissions Performance Measure NPRM

Tags

• Bipartisan Infrastructure Law

Contact Us

FHWA Office of Public Affairs U.S. Department of Transportation, Federal Highway Administration, Office of Public Affairs 1200 New Jersey Avenue, SE Washington, DC20590 **United States**

Email:

FHWA.PressOffice@dot.gov Phone: (202) 366-0660

If you are deaf, hard of hearing, or have a speech disability, please dial 7-1-1 to access telecommunications relay services.

Biden-Harris Administration Takes Step Forward to Combat Climate Change, Announces Proposed Transportation Greenhouse Gas Emission Reduction Framework

Thursday, July 7, 2022

FHWA 22-22

Contact: FHWA.PressOffice@dot.gov

Tel.: (202) 366-0660

WASHINGTON - Today, to advance President Biden's commitment to combat climate change and bring down costs for families, the U.S. Department of Transportation's Federal Highway Administration (FHWA) announced a Notice of Proposed Rulemaking (NPRM) for states and municipalities to track and reduce greenhouse gas (GHG) emissions. President Biden's Bipartisan Infrastructure Law (BIL) makes available more than \$27 billion in federal funding to help State Departments of Transportation (State DOTs) and Metropolitan Planning Organizations (MPOs) meet their declining GHG targets. The new rule would take two important steps to combat climate change:

- 1. Establish a national framework for tracking state-by-state progress by adding a new GHG performance management measure to the existing FHWA national performance measures to help states track performance and make more informed investment decisions.
- 2. Create a flexible system under which State DOTs and MPOs would set their own declining targets for on-road greenhouse gas emissions from roadway travel on the National Highway System.

"With today's announcement, we are taking an important step forward in tackling transportation's share of the climate challenge, and we don't have a moment to waste," said U.S. Transportation Secretary Pete ButtigiegOur approach gives states the flexibility they need to set their own emission reduction targets, while providing them with resources from President Biden's Bipartisan Infrastructure Law to meet those targets and protect their communities."

This proposed rule builds upon and would add greater transparency to the work that 24 states and the District of Columbia are already doing Case 5:23-CV-00304-H Document 15-20 Filed 01/31/24 Page 923 of 1050 Page 10 4371 under state law GHG target-setting requirements.

Transportation is the leading source of GHGs in the U.S., and the Biden-Harris Administration has put forward an integrated approach to reducin emissions from the sector while ensuring our economy works for all Americans. This entails the use of Bipartisan Infrastructure Law funding to help state and local governments meet their GHG reduction targets, in addition to efforts to help reduce transportation costs for the American people through the National Highway Traffic Safety Administration's Corporate Average Fuel Economy standards, which are in place to make driving more affordable by increasing fuel efficiency.

Bipartisan Infrastructure Law funding is available through various programs over five years, including but not limited to:

- The **Carbon Reduction Program** will provide \$6.4 billion in formula funding to states and local governments to develop carbon reduction strategies and fund a wide range of projects designed to reduce carbon emissions from on-road highway sources.
- The **National Electric Vehicle Infrastructure (NEVI) Formula Program**vill provide \$5 billion to states primarily through a statutory formula to build out a<u>national electric vehicle charging network</u>an important step towards making electric vehicle charging accessible to all Americans.
- A **Discretionary Grant Program for Charging and Fueling Infrastructure** will provide \$2.5 billion in competitive funding to states and local governments to deploy electric vehicle charging and hydrogen, propane, and natural gas fueling infrastructure along designated alternative fuel corridors and in communities.
- The **Congestion Relief Program**will provide \$250 million in competitive funding to advance innovative, multimodal solutions to reduce congestion and related economic and environmental costs in the most congested metropolitan areas of the U.S.
- The **Reduction of Truck Emissions at Port Facilities Program**vill provide \$400 million in competitive funding to reduce truck idling and emissions at ports, including through the advancement of port electrification.
- BIL includes more than \$5 billion for the Federal Transit Administration's wor No Emission Vehicle Program which will help ensure our nation's transit systems are tackling the climate crisis and working better for all of us.
- BIL also includes \$7.2 billion for the Transportation Alternatives Set-Aside that can help state and local governments carry out
 environmentally friendly pedestrian and bicycle infrastructure projects.
- Additionally, FTA's \$69 million **Transit Oriented Development (TOD) Program**rovides funding to local communities to integrate land use and transportation planning with new fixed guideway or core capacity transit capital investment projects. BIL also expands TOD funding opportunities through the Transportation Infrastructure Finance and Innovation Act (TIFIA) and Railroad Rehabilitation & Improvement Financing (RRIF) programs.

In addition to new funding sources that states can access from the Bipartisan Infrastructure Law, new and existing formula programs provide states and local governments critical access to funding to encourage public transportation and other integrated land use and transportation projects and strategies that reduce air pollution by giving Americans more climate-friendly options for travel, and help state and local governments meet the emissions reduction targets this proposed rule would require them to set for themselves.

"Every state and local government in this country is seeing the impacts of climate change on their communities and infrastructure. States have a critical role to play as we work nationwide to bring down greenhouse gas emissions and slow those impacts," saleputy Federal Highway Administrator Stephanie Pollack. "State laws already require 24 states and the District of Columbia to set targets and track their greenhouse gas emissions and this proposed rule would bring this locally proven approach to scale nationwide."

This proposed rule would help the transportation sector evolve from the leading source of emissions to become the biggest part of the solution, standardizing practices that many states have already established economy-wide, by making data comparable across states lines and metropolitan areas, and by facilitating better planning and outcomes for local communities.

The proposed rule also aligns with the Administration's net-zero targets as outlined in the national policy established under Executive Orders (E.O.) 13990, "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis," and E.O. 14008 atkling the Climate Crisis at Home and Abroad."

The proposed rule would require State DOTs and MPOs to report biennially on their progress in meeting the declining targets they establish and require FHWA to assess significant progress toward achieving those targets.

The proposed rule has been <u>published in the Federal Register</u> A final rule may be published after FHWA has had the opportunity to review the comments submitted.

###

U.S. DEPARTMENT OF TRANSPORTATION

Federal Highway Administration

1200 NEW JERSEY AVENUE, SE

WASHINGTON, DC 20590

202-366-4000

Subscribe To Email Undates

Document 15-20

Filed 01/31/24

Page 924 of 1050

PageID 437













About

About FHWA

Careers

Org Chart

Staff Directories

Work with Us

Programs

Acquisition Management

Civil Rights

Federal Lands Highway

<u>Infrastructure</u>

Innovative Program Delivery

Operations

Planning, Environment, and Realty

<u>Policy</u>

Research, Development, and Technology

<u>Safety</u>

Policies, Rights, Legal

About DOT

<u>Accessibility</u>

Budget and Performance

Civil Rights

<u>FOIA</u>

Information Quality

No FEAR Act

Office of Inspector General

<u>Privacy Policy</u>

<u>USA.gov</u>

Web Policies and Notices

Web Standards

News & Events

Newsroom

Press Releases

Speeches & Testimony

Media Contacts

Connect with Us

Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990

Interagency Working Group on Social Cost of Greenhouse Gases, United States Government

With participation by

Council of Economic Advisers
Council on Environmental Quality
Department of Agriculture
Department of Commerce
Department of Energy
Department of Health and Human Services
Department of the Interior
Department of Transportation
Department of the Treasury
Environmental Protection Agency
National Climate Advisor
National Economic Council
Office of Management and Budget
Office of Science and Technology Policy

February 2021

Preface

The Interagency Working Group (IWG) on the Social Cost of Greenhouse Gases is committed to ensuring that the estimates agencies use when monetizing the value of changes in greenhouse gas emissions resulting from regulations and other relevant agency actions continue to reflect the best available science and methodologies. This Technical Support Document (TSD) presents interim estimates of the social cost of carbon, methane, and nitrous oxide developed under Executive Order 13990. These interim values are the same as those developed by the IWG in 2013 and 2016. The current IWG will take comment on recent developments in the science and economics for use in a more comprehensive update, to be issued by January 2022, which will more fully address the recommendations of the National Academies of Sciences, Engineering, and Medicine as reported in Valuing Climate Damages: Updating Estimation of the Social Cost of Carbon Dioxide (2017) and other pertinent scientific literature. As a part of that request for comment, the IWG will seek comment on the discussion of advances in science and methodology included in this TSD and how those advances can best be incorporated into the revised final estimates.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 928 of 1050 PageID 4376

Executive Summary

A robust and scientifically founded assessment of the positive and negative impacts that an action can be expected to have on society provides important insights in the policy-making process. The estimates of the social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) presented here allow agencies to understand the social benefits of reducing emissions of each of these greenhouse gases, or the social costs of increasing such emissions, in the policy making process. Collectively, these values are referenced as the "social cost of greenhouse gases" (SC-GHG) in this document. The SC-GHG is the monetary value of the net harm to society associated with adding a small amount of that GHG to the atmosphere in a given year. In principle, it includes the value of all climate change impacts, including (but not limited to) changes in net agricultural productivity, human health effects, property damage from increased flood risk natural disasters, disruption of energy systems, risk of conflict, environmental migration, and the value of ecosystem services. The SC-GHG, therefore, should reflect the societal value of reducing emissions of the gas in question by one metric ton. The marginal estimate of social costs will differ by the type of greenhouse gas (such as carbon dioxide, methane, and nitrous oxide) and by the year in which the emissions change occurs. The SC-GHGs are the theoretically appropriate values to use in conducting benefit-cost analyses of policies that affect GHG emissions.

Federal agencies began regularly incorporating social cost of carbon (SC-CO₂) estimates in benefit-cost analyses conducted under Executive Order (E.O.) 128661 in 2008, following a court ruling in which an agency was ordered to consider the value of reducing CO₂ emissions in a rulemaking process. The U.S. Ninth Circuit Court of Appeals remanded a fuel economy rule to DOT for failing to monetize CO₂ emission reductions, stating that "while the record shows that there is a range of values, the value of carbon emissions reduction is certainly not zero." In 2009, an interagency working group (IWG) was established to ensure that agencies were using the best available science and to promote consistency in the values used across agencies. The IWG published SC-CO2 estimates in 2010 that were developed from an ensemble of three widely cited integrated assessment models (IAMs) that estimate global climate damages using highly aggregated representations of climate processes and the global economy combined into a single modeling framework. The three IAMs were run using a common set of input assumptions in each model for future population, economic, and GHG emissions growth, as well as equilibrium climate sensitivity (ECS) – a measure of the globally averaged temperature response to increased atmospheric CO₂ concentrations. These estimates were updated in 2013 based on new versions of each IAM. In August 2016 the IWG published estimates of the social cost of methane (SC-CH₄) and nitrous oxide (SC-N₂O) using methodologies that are consistent with the methodology underlying the SC-CO2 estimates. In January 2017, the National Academies of Sciences, Engineering, and Medicine issued recommendations for an updating process to ensure the estimates continue to reflect the best available science. In March 2017, Executive Order 13783 disbanded the IWG and instructed agencies when monetizing the value of changes

¹ Under E.O. 12866, agencies are required, to the extent permitted by law and where applicable, "to assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs." As indicated in the discussion above, many statutes also require agencies to conduct at least some of the same analyses required under E.O. 12866, such as the Energy Policy and Conservation Act which mandates the setting of fuel economy regulations.

² Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin., 538 F.3d 1172, 1200 (9th Cir. 2008).

in greenhouse gas emissions resulting from regulations to follow the Office of Management and Budget's (OMB) Circular A-4.

On January 20, 2021, President Biden issued E.O. 13990 which re-established the IWG and directed it to ensure that SC-GHG estimates used by the U.S. Government (USG) reflect the best available science and the recommendations of the National Academies (2017) and work towards approaches that take account of climate risk, environmental justice, and intergenerational equity. The IWG was tasked with first reviewing the SC-GHG estimates currently used by the USG and publishing interim estimates within 30 days of the E.O. that reflect the full impact of GHG emissions, including taking global damages into account. In this initial review, the IWG finds that the SC-GHG estimates used since E.O. 13783 fail to reflect the full impact of GHG emissions in multiple ways. First, the IWG found previously and is restating here that a global perspective is essential for SC-GHG estimates because climate impacts occurring outside U.S. borders can directly and indirectly affect the welfare of U.S. citizens and residents. Thus, U.S. interests are affected by the climate impacts that occur outside U.S. borders. Examples of affected interests include: direct effects on U.S. citizens and assets located abroad, international trade, tourism, and spillover pathways such as economic and political destabilization and global migration. In addition, assessing the benefits of U.S. GHG mitigation activities requires consideration of how those actions may affect mitigation activities by other countries, as those international mitigation actions will provide a benefit to U.S. citizens and residents by mitigating climate impacts that affect U.S. citizens and residents. Second, the IWG found previously and is restating here that the use of the social rate of return on capital to discount the future benefits of reducing GHG emissions inappropriately underestimates the impacts of climate change for the purposes of estimating the SC-GHG (see Section 3.1). Consistent with the findings of the National Academies (2017) and the economic literature, the IWG continues to conclude that the consumption rate of interest is the theoretically appropriate discount rate in an intergenerational context (IWG 2010, 2013, 2016). The IWG recommends that discount rate uncertainty and relevant aspects of intergenerational ethical considerations be accounted for in selecting future discount rates.

While the IWG works to assess how best to incorporate the latest, peer reviewed science to develop an updated set of SC-GHG estimates, it is setting interim estimates to be the most recent estimates developed by the IWG prior to the group being disbanded in 2017. The IWG concludes that these interim estimates represent the most appropriate estimate of the SC-GHG until the revised estimates have been developed. This update reflects the immediate need to have an operational SC-GHG for use in regulatory benefit-cost analyses and other applications that was developed using a transparent process, peer-reviewed methodologies, and the science available at the time of that process. Those estimates were subject to public comment in the context of dozens of proposed rulemakings as well as in a dedicated public comment period in 2013.

At the same time, consistent with its continuing commitment to a transparent process and a desire to move quickly to update SC-GHG estimates to better reflect the recent science, the IWG will be taking comment on how to incorporate the recommendations of the National Academies (2017) and other recent science, including the advances discussed in this Technical Support Document (TSD), both during the development of the fully updated SC-GHG estimates to be released by January of 2022 and in subsequent updates. The IWG will soon issue a Federal Register notice with a detailed set of requests for public comments on the new information presented in this TSD, as well as other topics and issues the IWG will address as we develop the next set of updates.

This TSD presents the IWG's interim findings and provides interim estimates of the SC-CO₂, SC-CH₄, and SC-N₂O that should be used by agencies until a comprehensive review and update is developed in line with the requirements in E.O. 13990. The TSD maintains the same methodological approach as has been used for global USG SC-GHG estimation to date. The estimates rely on the same models and harmonized inputs and are calculated using a range of discount rates. At this time, the IWG has determined that it is appropriate for agencies to revert to the same set of four values drawn from the SC-GHG distributions based on three discount rates (2.5 percent, 3 percent, and 5 percent) as were used in regulatory analyses between 2010 and 2016 and subject to public comment. However, as described below, based on the IWG's initial review, new data and evidence strongly suggests that the discount rate regarded as appropriate for intergenerational analysis is lower.

Tables ES-1, ES-2, and ES-3 summarize the interim SC-CO₂, SC-CH₄, and SC-N₂O estimates, respectively, for the years 2020 through 2050. These estimates are reported in 2020 dollars but are otherwise identical to those presented in the previous version of the TSD and its Addendum, released in August 2016. For purposes of capturing uncertainty around the SC-GHG estimates in analyses, the IWG emphasized previously and reemphasizes here the importance of considering all four of the SC-GHG values. In particular, this TSD discusses how the understanding of discounting approaches suggests discount rates appropriate for intergenerational analysis in the context of climate change that are lower than 3 percent. Consistent with the guidance in E.O. 13990 for the IWG to ensure that the SC-GHG reflect the interests of future generations, the latest scientific and economic understanding of discount rates discussed in this TSD, and the recommendation from OMB's Circular A-4 to include sensitivity analysis with lower discount rates when a rule has important intergenerational benefits or costs, agencies may consider conducting additional sensitivity analysis using discount rates below 2.5 percent. Furthermore, the IAMs used to produce these interim estimates do not include all of the important physical, ecological, and economic impacts of climate change recognized in the climate change literature. For these same impacts, the science underlying their "damage functions" – i.e., the core parts of the IAMs that map global mean temperature changes and other physical impacts of climate change into economic (both market and nonmarket) damages - lags behind the most recent research. Likewise, the assumptions regarding equilibrium climate sensitivity and socioeconomic and emissions scenarios used as inputs to the model runs in this TSD will need to be updated. It is the IWG's judgment that, taken together, these limitations suggest that the range of four interim SC-GHG estimates presented in this TSD likely underestimate societal damages from GHG emissions.

Table ES-1: Social Cost of CO₂, 2020 - 2050 (in 2020 dollars per metric ton of CO₂)³

	Discount Rate and Statistic				
Emissions Year	5% Average	3% Average	2.5% Average	3% 95 th Percentile	
2020	14	51	76	152	
2025	17	56	83	169	
2030	19	62	89	187	
2035	22	67	96	206	
2040	25	73	103	225	
2045	28	79	110	242	
2050	32	85	116	260	

Table ES-2: Social Cost of CH₄, 2020 - 2050 (in 2020 dollars per metric ton of CH₄)

	Discount Rate and Statistic				
Emissions	5%	3%	2.5%	3%	
Year	Average	Average	Average	95 th Percentile	
2020	670	1500	2000	3900	
2025	800	1700	2200	4500	
2030	940	2000	2500	5200	
2035	1100	2200	2800	6000	
2040	1300	2500	3100	6700	
2045	1500	2800	3500	7500	
2050	1700	3100	3800	8200	

 $^{^3}$ The values reported in this TSD are identical to those reported in the 2016 TSD adjusted for inflation to 2020 dollars using the annual GDP Implicit Price Deflator values in the U.S. Bureau of Economic Analysis' (BEA) NIPA Table 1.1.9: 113.626 (2020)/ 92.486 (2007) = 1.228575 (U.S. BEA 2021). Values are the average across models and socioeconomic emissions scenarios for each of three discount rates (2.5%, 3%, and 5%), plus a fourth value, selected as the 95th percentile of estimates based on a 3 percent discount rate. Values of SC-CO₂ are rounded to the nearest dollar; SC-CH₄ and SC-N₂O are rounded to two significant figures. The annual unrounded estimates are available on OMB's website for use in regulatory and other analyses: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs

Table ES-3: Social Cost of N₂O, 2020 – 2050 (in 2020 dollars per metric ton of N₂O)

	Discount Rate and Statistic			
Emissions	5%	3%	2.5%	3%
Year	Average	Average	Average	95 th Percentile
2020	5800	18000	27000	48000
2025	6800	21000	30000	54000
2030	7800	23000	33000	60000
2035	9000	25000	36000	67000
2040	10000	28000	39000	74000
2045	12000	30000	42000	81000
2050	13000	33000	45000	88000

While point estimates are important for providing analysts with a tractable approach for regulatory analysis, they do not fully quantify uncertainty associated with the SC-GHG estimates. Figures ES-1 through ES-3 present the quantified sources of uncertainty in the form of frequency distributions for the SC-GHG estimates for emissions in 2020. The distributions of SC-GHG estimates reflect uncertainty in key model parameters chosen by the IWG such as the equilibrium climate sensitivity, as well as uncertainty in other parameters set by the original model developers. To highlight the difference between the impact of the discount rate and other quantified sources of uncertainty, the bars below the frequency distributions provide a symmetric representation of quantified variability in the SC-GHG estimates for each discount rate. There are other sources of uncertainty that have not yet been quantified and are thus not reflected in these estimates. When an agency determines that it is appropriate to conduct additional quantitative uncertainty analysis, it should follow best practices for probabilistic analysis.⁴ The full set of information that underlies the frequency distributions in Figures ES-1 through ES-3 is available on OMB's website⁵.

⁴ See e.g. OMB's Circular A-4, section on *Treatment of Uncertainty*. Available at: https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A4/a-4.pdf.

⁵ Available at https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs

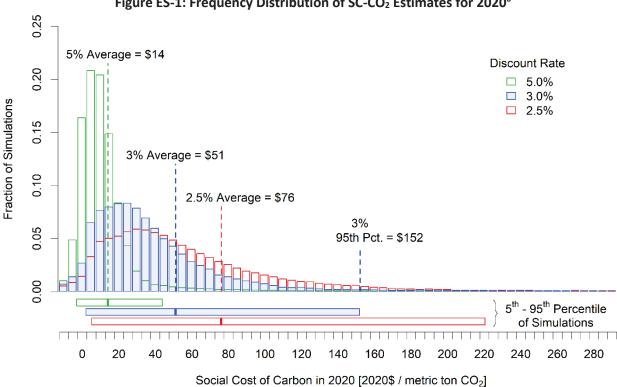
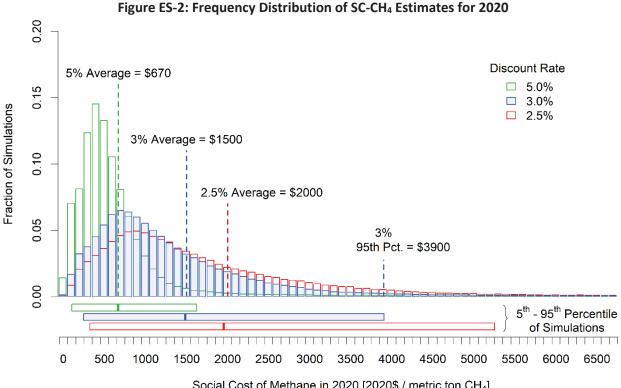
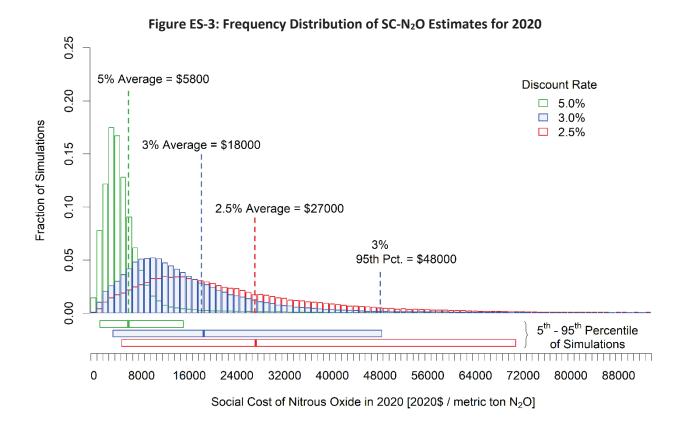


Figure ES-1: Frequency Distribution of SC-CO₂ Estimates for 2020⁶

⁶ Although the distributions and numbers in Figures ES-1, ES-2, and ES-3 are based on the full set of model results (150,000 estimates for each discount rate and gas), for display purposes the horizontal axis is truncated with 0.02 to 0.68 percent of the estimates falling below the lowest bin displayed and 0.12 to 3.11 percent of the estimates falling above the highest bin displayed, depending on the discount rate and GHG.



Social Cost of Methane in 2020 [2020\$ / metric ton CH4]



Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 935 of 1050 PageID 4383

1 Background

The estimates of the social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) presented here allow agencies to incorporate the social benefits of reducing emissions of each of these greenhouse gases, or the social costs of increasing such emissions, in decision making. Collectively, these values are referenced as the "social cost of greenhouse gases" (SC-GHG) in this document. The SC-GHG is the monetary value of the net harm to society associated with adding a small amount of that GHG to the atmosphere in a given year. In principle, it includes the value of all climate change impacts, including (but not limited to) changes in net agricultural productivity, human health effects, property damage from increased flood risk natural disasters, disruption of energy systems, risk of conflict, environmental migration, and the value of ecosystem services. The SC-GHG, therefore, should reflect the societal value of reducing emissions of the gas in question by one ton. The marginal estimate of social costs will differ by the type of greenhouse gas (such as carbon dioxide, methane, and nitrous oxide) and by the year in which the emissions change occurs. The SC-GHGs are calculated along a baseline path and provide a measure of the marginal benefit of GHG abatement. Thus, they are the theoretically appropriate values to use when conducting benefit-cost analyses of policies that affect GHG emissions.⁷

1.1 Overview of U.S. Government SC-GHG Estimates to Date

Estimates of the social cost of carbon and other greenhouse gases have been published in the academic literature for many years. Meta-reviews of SC-CO₂ estimates were available as early as 2002 (Clarkson and Deyes 2002). Federal agencies began regularly incorporating SC-CO₂ estimates in regulatory impact analyses in 2008, following a court ruling in which an agency was ordered to consider the SC-CO₂ in the rulemaking process. The U.S. Ninth Circuit Court of Appeals remanded a fuel economy rule to the Department of Transportation (DOT) for failing to consider the value of reducing CO₂ emissions, stating that "while the record shows that there is a range of values, the value of carbon emissions reduction is certainly not zero."

⁷ These estimates of social damages should not be confused with estimates of the costs of attaining a specific emissions or warming limit. Specifically, there is another strand of research that investigates the costs of setting a specific climate target (e.g., capping emissions or temperature increases to a certain level). If total emissions are capped, IAM models can estimate the costs of limiting emissions or temperature increase to that cap. Similarly, other models simulate market trading in a cap and trade system. The price of a permit to emit one ton of carbon provides a measure of the marginal cost of GHG abatement, which can be useful in evaluating policy cost-effectiveness but is not an alternative way to value damages from GHG emissions in benefit-cost analysis. Moreover, a policy that specifies an environmental target implicitly requires a valuation of damages when setting the constraint even though it is not explicitly modeled or estimated. For example, a target set to keep temperature increases below a certain threshold implicitly places value on damages incurred beyond that threshold. For more on how these concepts (e.g., a predetermined target-based approach and a damage (SC-GHG) based approach) can be used when designing climate policy see, for example, Hansel et al. (2020) and Stern and Stiglitz (2021).

⁸ Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin., 538 F.3d 1172, 1200 (9th Cir. 2008).

In 2009, an interagency process was launched, under the leadership of the Office of Management and Budget (OMB) and the Council of Economic Advisers (CEA), that sought to harmonize a range of different SC-CO₂ values being used across multiple Federal agencies. The purpose of this process was to ensure that agencies were using the best available information and to promote consistency in the way agencies quantify the benefits of reducing CO₂ emissions in regulatory impact analyses. This included the establishment of an IWG which represented perspectives and technical expertise from many federal agencies and a commitment to following the peer-reviewed literature. In 2010, the IWG finalized a set of four SC-CO₂ values for use in regulatory analyses and presented them in a TSD that also provided guidance for agencies on using the estimates (IWG 2010). Three of these values were based on the average SC-CO₂ from three widely cited integrated assessment models (IAMs) in the peer-reviewed literature – DICE, PAGE, and FUND⁹ – at discount rates of 2.5, 3, and 5 percent. The fourth value was included to represent higher-than-expected economic impacts from climate change further out in the tails of the SC-CO₂ distribution. For this purpose, it used the SC-CO₂ value for the 95th percentile at a 3 percent discount rate.

In May of 2013, the IWG provided an update of the SC-CO₂ estimates to incorporate new versions of the IAMs used in the peer-reviewed literature (IWG 2013). The 2013 update did not revisit other IWG modeling decisions (i.e., the discount rates or harmonized inputs for socioeconomic and emission scenarios and equilibrium climate sensitivity). Improvements in the way damages are modeled were confined to those that had been incorporated into the latest versions of the models by the developers themselves in the peer-reviewed literature.¹⁰ In August of 2016, the IWG published estimates of the social cost of methane (SC-CH₄) and nitrous oxide (SC-N₂O) that are consistent with the methodology underlying the SC-CO₂ estimates (IWG 2016a, 2016b).

Over the course of developing and updating the USG SC-GHG, through both the IWG and individual agencies, there were extensive opportunities for public input on the estimates and underlying methodologies. There was a public comment process associated with each proposed rulemaking that used the estimates, and OMB initiated a separate comment process on the IWG TSD in 2013. Commenters offered a wide range of perspectives on all aspects of process, methodology, and final estimates and diverse suggestions for improvements. The U.S. Government Accountability Office (GAO) also reviewed the development of the USG SC-CO₂ estimates and concluded that the IWG processes and methods reflected three principles: consensus-based decision making, reliance on existing academic literature and models, and disclosure of limitations and incorporation of new information (U.S. GAO 2014).

_

⁹ The DICE (Dynamic Integrated Climate and Economy) model by William Nordhaus evolved from a series of energy models and was first presented in 1990 (Nordhaus and Boyer 2000, Nordhaus 2008). The PAGE (Policy Analysis of the Greenhouse Effect) model was developed by Chris Hope in 1991 for use by European decision-makers in assessing the marginal impact of carbon emissions (Hope 2006, Hope 2008). The FUND (Climate Framework for Uncertainty, Negotiation, and Distribution) model, developed by Richard Tol in the early 1990s, originally to study international capital transfers in climate policy was widely used to study climate impacts (e.g., Tol 2002a, Tol 2002b, Anthoff et al. 2009, Tol 2009).

¹⁰ The IWG subsequently provided additional minor technical revisions in November of 2013 and July of 2015, as explained in Appendix B of the 2016 TSD (IWG 2016a).

In 2015, as part of the IWG response to the public comments received in the 2013 solicitation, the IWG announced a National Academies of Sciences, Engineering, and Medicine review of the IWG estimates (IWG 2015). Specifically, the IWG asked the National Academies to conduct a multi-discipline, two-phase assessment of the IWG estimates and to offer advice on how to approach future updates to ensure that the estimates continue to reflect the best available science and methodologies. The National Academies' interim (Phase 1) report (National Academies 2016a) recommended against a near term update of the SC-CO₂ estimates within the existing modeling framework. For future revisions, the National Academies recommended the IWG move efforts towards a broader update of the climate system module consistent with the most recent, best available science and offered recommendations for how to enhance the discussion and presentation of uncertainty in the SC-CO₂ estimates. In addition to publishing estimates of SC-CH₄ and SC-N₂O, the IWG's 2016 TSD revision responded to the National Academies' Phase 1 report recommendations regarding presentation of uncertainty. The revisions included: an expanded presentation of the SC-GHG estimates that highlights a symmetric range of uncertainty around estimates for each discount rate; new sections that provide a unified discussion of the methodology used to incorporate sources of uncertainty; detailed explanation of the uncertain parameters in both the FUND and PAGE models; and making the full set of SC-CO₂ estimates easily accessible to the public on OMB's website.

In January 2017, the National Academies released their final report, Valuing Climate Damages: Updating Estimation of the Social Cost of Carbon Dioxide, and recommended specific criteria for future updates to the SC-CO₂ estimates, a modeling framework to satisfy the specified criteria, and both near-term updates and longer-term research needs pertaining to various components of the estimation process (National Academies 2017). A description of the National Academies' recommendations for near-term updates are described in Section 1.2 of this document. Shortly thereafter, in March 2017, President Trump issued Executive Order (E.O.) 13783 which called for the rescission and review of several climate-related Presidential and regulatory actions as well as for a review of the SC-GHG estimates used for regulatory impact analysis. E.O. 13783 disbanded the IWG, withdrew the previous TSDs, and directed agencies to ensure SC-GHG estimates used in regulatory analyses are consistent with the guidance contained in OMB's Circular A-4, "including with respect to the consideration of domestic versus international impacts and the consideration of appropriate discount rates" (E.O. 13783, Section 5(c)). Benefit-cost analyses following E.O. 13783 used SC-GHG estimates that attempted to focus on the domestic impacts of climate change as estimated by the models to occur within U.S. borders and were calculated using two discount rates recommended by OMB's Circular A-4, 3 percent and 7 percent. 11 All other methodological decisions and model versions used in SC-GHG calculations remained the same as those used by the IWG in 2010 and 2013, respectively.

On January 20, 2021, President Biden issued E.O. 13990, which re-established the IWG and directed it to ensure that USG SC-GHG estimates reflect the best available science and the recommendations of the National Academies (2017). The IWG was tasked with first reviewing the SC-GHG estimates currently used by the USG and publishing interim estimates within 30 days of the E.O. that reflect the full impact of GHG emissions, including by taking global damages into account. The E.O. instructs the IWG to develop final SC-GHG estimates by January 2022. Section 1.3 describes requirements established by E.O. 13990 in greater detail. In addition, the E.O. instructs the IWG to provide recommendations to the President by

¹¹ OMB Circular A-4 (2003) indicates that sensitivity analysis using lower discount rates than 3 percent and 7 percent may be appropriate where intergenerational effects are important. See Section 3 for further discussion.

September 2021, regarding areas of decision-making, budgeting, and procurement by the Federal Government where the SC-GHG should be applied. The SC-GHG has been used previously in non-regulatory Federal analysis, such as in federal procurement, grant programs, and National Environmental Policy Act (NEPA) analysis, as well as in state level applications; the latter is discussed further in Section 5.

1.2 Recommendations from the National Academies of Sciences, Engineering, and Medicine

In 2015, the IWG requested that the National Academies of Sciences, Engineering, and Medicine review and recommend potential approaches for improving its SC-CO₂ estimation methodology. In response, the National Academies convened a multidisciplinary committee, the Committee on Assessing Approaches to Updating the Social Cost of Carbon. In addition to evaluating the IWG's overall approach to SC-CO₂ estimation, the committee reviewed its choices of IAMs and damage functions, climate science assumptions, future baseline socioeconomic and emission projections, presentation of uncertainty, and discount rates.

In its final report (National Academies 2017), the National Academies committee recommended that the IWG pursue an integrated modular approach to the key components of SC-CO₂ estimation to allow for independent updating and review and to draw more readily on expertise from the wide range of scientific disciplines relevant to SC-CO₂ estimation. Under this approach, each step in SC-CO₂ estimation is developed as a module—socioeconomic projections, climate science, economic damages, and discounting—that reflects the state of scientific knowledge in the current, peer-reviewed literature. In the longer-term, it recommended that the IWG also fund research on ways to better capture interactions and feedbacks between these components. In addition, the committee noted that, while the IWG harmonized assumptions across the IAMs for socioeconomic and emission projections, climate sensitivity, and discount rates when estimating the SC-CO₂, using a single climate module in the nearer-term (2-3 years) and eventually transitioning to a single IAM framework will enhance transparency, improve consistency with the underlying science, and allow for more explicit representation of uncertainty. It recommended these three criteria also be used to judge the value of other updates to the methodology. In addition, it recommended that the IWG update SC-CO₂ estimates at regular intervals, suggesting a five-year cycle.

Regarding the key components of the SC-CO₂, the committee recommended the following improvements in the nearer-term:

• <u>Socioeconomic and emissions projections</u>: Use accepted statistical methods and elicit expert judgment to project probability distributions of future annual growth rates of per-capita GDP and

12

 $^{^{12}}$ For example, SC-CO $_2$ estimates have been used in Domestic Delivery Services contracts for USG parcel shipping (https://westcoastclimateforum.com/sites/westcoastclimateforum/files/related_documents/FedGSA_DDS3_green_features_fact_sheet.pdf).

¹³ For example, in 2016 DOT's Transportation Investment Generating Economic Recovery (TIGER) discretionary grant program required a demonstration that benefits justify costs for proposed projects, and the guidance DOT provides to applicants for how to conduct such an analysis specified that they should use the USG SC-CO₂ estimates (https://www.transportation.gov/sites/dot.gov/files/docs/BCARG2016March.pdf).

¹⁴ See Howard and Schwartz (2019) for examples of the use of SC-CO₂ estimates in NEPA analyses.

population, bearing in mind potential correlation between economic and population projections. Then using expert elicitation, guided by information on historical trends and emissions consistent with different climate outcomes, project emissions for each forcing agent of interest conditional on population and income scenarios. Additional recommendations were offered for improving the socioeconomic module centered on four broad criteria: time horizon, future policies, disaggregation, and feedbacks.

- <u>Climate science</u>: Adopt or develop a simple Earth system model (such as the Finite Amplitude Impulse Response (FaIR) model) to capture relationships between CO₂ emissions, atmospheric CO₂ concentrations, and global mean surface temperature change over time while accounting for non-CO₂ forcing and allowing for the evaluation of uncertainty. It also recommended the IWG adopt or develop a sea level rise component in the climate module that: (1) accounts for uncertainty in the translation of global mean temperature to global mean sea level rise and (2) is consistent with sea level rise projections available in the literature for similar forcing and temperature pathways. It also noted the importance of generating spatially and temporally disaggregated climate information as inputs into damage estimation. It recommended the use of linear pattern scaling (which estimates linear relationships between global mean temperature and local climate variables) to achieve this goal in the near-term.
- <u>Economic damages</u>: Improve and update existing formulations of individual sectoral damage functions when feasible; characterize damage function calibrations quantitatively and transparently; present spatially disaggregated damage projections and discuss how they scale with temperature, income, and population; and recognize any correlations between formulations when multiple damage functions are used.
- <u>Discounting</u>: Account for the relationship between economic growth and discounting; explicitly recognize uncertainty surrounding discount rates over long time horizons using a Ramsey-like approach; select parameters to implement this approach that are consistent with theory and evidence to produce certainty-equivalent discount rates consistent with near-term consumption rates of interest; use three sets of Ramsey parameters to generate a low, central, and high certainty-equivalent near-term discount rate, and three means and ranges of SC-CO₂ estimates; discuss how the SC-CO₂ estimates should be combined with other cost and benefit estimates that may use different discount rates in regulatory analysis.

Additional details on each of these recommendations as well as longer term research needs are provided in the National Academies' final report (National Academies 2017).

1.3 Executive Order 13990

On January 20, 2021, President Biden issued E.O. 13990, "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis." Echoing one of the general principles of E.O. 12866 that an Agency "shall base its decisions on the best reasonably obtainable scientific, technical, economic, and other information", E.O. 13990 states that it is essential for Agencies to account for the benefits of reducing GHG emissions as accurately as possible. It emphasizes that a full global accounting of the costs of GHG emissions "facilitates sound decision-making, recognizes the breadth of climate impacts, and supports the international leadership of the United States on climate issues" (E.O. 13990 2021). Specifically, E.O. 13990 reinstates the IWG as the Interagency Working Group on the Social Cost of Greenhouse Gases, names the Chair of the CEA, Director of OMB, and Director of the Office of Science

and Technology Policy (OSTP) as co-chairs of the IWG, and specifies the membership of the IWG to include the following officials, or their designees: the Secretary of the Treasury; the Secretary of the Interior; the Secretary of Agriculture; the Secretary of Commerce; the Secretary of Health and Human Services; the Secretary of Transportation; the Secretary of Energy; the Chair of the Council on Environmental Quality; the Administrator of the Environmental Protection Agency; the Assistant to the President and National Climate Advisor; and the Assistant to the President for Economic Policy and Director of the National Economic Council.

E.O. 13990 tasks the reinstated IWG with the following:

- (1) publish an interim update to the SC-GHG (SC-CO₂, SC-CH₄, and SC-N₂O) estimates by February 19, 2021, for agencies to use when monetizing the value of changes in greenhouse gas emissions resulting from regulations and other relevant agency actions until final values are published;
- (2) publish a final update to the SC-GHG estimates by no later than January 2022;
- (3) provide recommendations, by no later than September 1, 2021, regarding areas of decision-making, budgeting, and procurement by the Federal Government where the SC-GHG estimates should be applied;
- (4) provide recommendations, by no later than June 1, 2022, regarding a process for reviewing and, as appropriate, updating the SC-GHG estimates to ensure that these estimates are based on the best available economics and science; and
- (5) provide recommendations, to be published with the interim SC-GHG estimates if feasible and by no later than June 1, 2022, to revise methodologies for SC-GHG calculations to the extent that current methodologies do not adequately take account of climate risk, environmental justice, and intergenerational equity.

Finally, the E.O. specifies that in carrying out its activities, the IWG shall consider the recommendations of the National Academies (2017) and other pertinent scientific literature; solicit public comment; engage with the public and stakeholders; seek the advice of ethics experts; and ensure that the SC-GHG estimates reflect the interests of future generations in avoiding threats posed by climate change.

This TSD presents the interim SC-GHG estimates called for in the first of these tasks. It also provides preliminary discussion of how at least one component of SC-GHG estimation, discounting, warrants reconsideration in the more comprehensive update by January 2022 to reflect the advice of the National Academies (2017) and other recent scientific literature.

2 The Importance of Accounting for Global Damages

Benefit-cost analyses of U.S. Federal regulations have traditionally focused on the benefits and costs that accrue to individuals that reside within the country's national boundaries. This is a natural result of the fact that most regulations have a limited impact on individuals residing outside of the United States and do not reflect any other scientific, legal, or other rationale. According to OMB's Circular A-4 (2003), an

"analysis should focus on benefits and costs that accrue to citizens and residents of the United States." While Circular A-4 does not elaborate, this guidance towards a focus on U.S. populations in domestic policy analysis is broadly consistent with the fact that the authority to regulate only extends to a nation's own residents who have consented to adhere to the same set of rules and values for collective decision-making (EPA 2010; Kopp et al. 1997; Whittington and MacRae 1986). However, guidance towards a focus on impacts to U.S. citizens and residents is different than recommending that analysis be limited to the impacts that occur within the borders of the U.S. Furthermore, OMB Circular A-4 states that when a regulation is likely to have international effects that "these effects should be reported" though the guidance recommends this be done separately. There are many reasons, as summarized in this TSD, why it is appropriate for agencies to use the global value of damages in making decisions that affect, or may be affected by, GHG emissions. Courts have upheld the use of global damages in estimating the social cost of GHGs, in part in recognition of the diverse ways in which U.S. interests, businesses, and residents may be impacted by climate change beyond U.S. borders. 16

Unlike many environmental problems where the causes and impacts are distributed more locally, climate change is a true global challenge making GHG emissions a global externality. GHG emissions contribute to damages around the world regardless of where they are emitted. The global nature of GHGs means that U.S. interests, and therefore the benefits to the U.S. population of GHG mitigation, cannot be defined solely by the climate impacts that occur within U.S. borders. Impacts that occur outside U.S. borders as a result of U.S. actions can directly and indirectly affect the welfare of U.S. citizens and residents through a multitude of pathways. Over 9 million U.S. citizens lived abroad as of 2016¹⁷ and U.S. direct investment positions abroad totaled nearly \$6 trillion in 2019.18 Climate impacts occurring outside of U.S. borders will have a direct impact on these U.S. citizens and the investment returns on those assets owned by U.S. citizens and residents. The U.S. economy is also inextricably linked to the rest of the world. The U.S. exports over \$2 trillion worth of goods and services a year and imports around \$3 trillion.¹⁹ Climate impacts that occur outside U.S. borders can thus impact the welfare of individuals and firms that reside in the United States through their effect on international markets, trade, tourism, and other activities. Furthermore, additional spillovers can occur through pathways such as economic and political destabilization and global migration that can lead to adverse impacts on U.S. national security, public health, and humanitarian concerns (DoD 2014, CCS 2018). As described by the National Academies (2017), to correctly assess the total damages to U.S. citizens and residents, one must account for these spillover effects on the United States.

As an empirical matter, the development of a domestic SC-GHG is greatly complicated by the relatively few region- or country-specific estimates of the SC-CO₂ in the literature. At present, the only quantitative

15

¹⁵ OMB's Circular A-4 provides guidance to Federal agencies on the development of regulatory analysis conducted pursuant to Executive Order 12866.

¹⁶ Zero Zone, Inc. v. Dep't of Energy, 832 F.3d 654, 678-79 (7th Cir. 2016) (rejecting a petitioner's challenge to DOE's use of a global (rather than domestic) social cost of carbon in setting an efficiency standard under the Energy Policy and Conservation Act, holding that DOE had reasonably identified carbon pollution as "a global externality" and concluding that, because "national energy conservation has global effects, . . . those global effects are an appropriate consideration when looking at a national policy.").

¹⁷ U.S. Department of State's Bureau of Consular Affairs.

¹⁸ BEA Direct Investment by Country and Industry 2019, https://www.bea.gov/data/intl-trade-investment/direct-investment-country-and-industry

¹⁹ BEA National Income and Product Accounts Table 1.1.5.

characterization of domestic damages from GHG emissions, as represented by the domestic SC-GHG, is based on the share of damages arising from climate impacts occurring within U.S. borders as represented in current IAMs. This is both incomplete and an underestimate of the share of total damages that accrue to the citizens and residents of the U.S. because these models do not capture the regional interactions and spillovers discussed above. A 2020 U.S. GAO study observed that "[a]ccording to the National Academies, the integrated assessment models were not premised or calibrated to provide estimates of the social cost of carbon based on domestic damages, and more research would be required to update the models to do so. The National Academies stated it is important to consider what constitutes a domestic impact in the case of a global pollutant that could have international implications that affect the United States" (U.S. GAO 2020).

The global nature of GHGs means that damages caused by a ton of emissions in the U.S. are felt globally and that a ton emitted in any other country harms those in the U.S. Therefore, assessing the benefits of U.S. GHG mitigation activities will require consideration of how those actions may affect mitigation activities by other countries since those international actions will provide a benefit to U.S. citizens and residents. A wide range of scientific and economic experts have emphasized the issue of reciprocity as support for considering global damages of GHG emissions (e.g., Kopp and Mignone 2013, Pizer et al. 2014, Howard and Schwartz 2019, Pindyck 2017, Revesz et al. 2017, Carleton and Greenstone 2021). Carleton and Greenstone (2021) discuss examples of how historic use of a global SC-CO₂ may have plausibly contributed to additional international action. Houser and Larson (2021) estimate that under the Paris Agreement, other countries pledged to reduce 6.1 to 6.8 tons for every ton pledged by the U.S. Kotchen (2018) offers a theoretical perspective showing that non-Nash game theoretic behavior can lead countries to optimally chose a social cost of carbon higher than their domestic value to encourage additional reductions from other countries. Using a global estimate of damages in U.S. analyses of regulatory and other actions allows the U.S. to continue to actively encourage other nations, including emerging major economies, to take significant steps to reduce emissions.

The IWG found previously and is restating here that because of the distinctive global nature of climate change that analysis of Federal regulatory and other actions should center on a global measure of SC-GHG. This approach is the same as that taken in regulatory analyses over 2009 through 2016. In the 2015 response to comments, the IWG noted that the only way to achieve an efficient allocation of resources for emissions reduction on a global basis is for all countries to base their policies on global estimates of damages (IWG 2015). Therefore, the IWG continues to recommend the use of global SC-GHG estimates in analysis of Federal regulatory and other actions. The IWG also continues to review developments in the literature, including more robust methodologies for estimating SC-GHG values based on purely domestic damages, and explore ways to better inform the public of the full range of carbon impacts, both global and domestic.

3 Discounting in Intergenerational Analyses

GHG emissions are stock pollutants, where damages are associated with what has accumulated in the atmosphere over time, and they are long lived such that subsequent damages resulting from emissions today occur over many decades or centuries depending on the specific greenhouse gas under

consideration.²⁰ In calculating the SC-GHG, the stream of future damages to agriculture, human health, and other market and non-market sectors from an additional unit of emissions are estimated in terms of reduced consumption (or consumption equivalents). Then that stream of future damages is discounted to its present value in the year when the additional unit of emissions was released. Given the long time horizon over which the damages are expected to occur, the discount rate has a large influence on the present value of future damages. However, the choice of a discount rate also raises highly contested and exceedingly difficult questions of science, economics, ethics, and law.

In 2010, in light of disagreements in the literature on the appropriate discount rate to use in this context, and uncertainty about how rates may change over time, the IWG elected to use three discount rates to span a plausible range of certainty-equivalent constant consumption discount rates: 2.5, 3, and 5 percent per year. The IWG at that time determined that these three rates reflected reasonable judgments under both descriptive and prescriptive approaches to selecting the discount rate.

The 3 percent value was included as consistent with estimates provided in OMB's Circular A-4 (OMB 2003) guidance for the consumption rate of interest. The IWG found that the consumption rate of interest is the correct discounting concept to use when future damages from elevated temperatures are estimated in consumption-equivalent units as is done in the IAMs used to estimate the SC-GHG (National Academies 2017). The upper value of 5 percent was included to represent the possibility that climate-related damages are positively correlated with market returns, which would imply a certainty equivalent value higher than the consumption rate of interest. The low value, 2.5 percent, was included to incorporate the concern that interest rates are highly uncertain over time. It represents the average certainty-equivalent rate using the mean-reverting and random walk approaches from Newell and Pizer (2003) starting at a discount rate of 3 percent. Using this approach, the certainty equivalent is about 2.2 percent using the random walk model and 2.8 percent using the mean reverting approach. Without giving preference to a particular model, the average of the two rates is 2.5 percent. Additionally, a rate below the consumption rate of interest would also be justified if the return to investments in climate mitigation are negatively correlated with the overall market rate of return. Use of this lower value was also deemed responsive to certain judgments based on the prescriptive or normative approach for selecting a discount rate and to related ethical objections that have been raised about rates of 3 percent or higher. Further details about the process for selecting these rates is presented in the 2010 TSD (IWG 2010). Finally, it is important to note that, while the consumption discount rate is the conceptually correct rate for discounting the SC-GHG, and the three rates originally selected were based on this concept, the latest data as well as recent discussion in the economics literature indicates that the 3 percent discount rate used by the IWG to develop its range of discount rates is likely an overestimate of the appropriate discount rate and warrants reconsideration in future updates of the SC-GHG.

This section discusses three issues related to the selected discount rates: (1) why the social rate of return to capital, estimated to be 7 percent in OMB's Circular A-4, is not appropriate for use in calculating the SC-GHG, (2) new evidence on the consumption rate of interest, which may inform the future updates to the SC-GHG, and (3) analytic consistency across discounting within an analysis.

²⁰ "GHGs, for example, CO₂, methane, and nitrous oxide, are chemically stable and persist in the atmosphere over time scales of a decade to centuries or longer, so that their emission has a long-term influence on climate. Because these gases are long lived, they become well mixed throughout the atmosphere" (IPCC 2007).

3.1 Social Rate of Return on Capital and Intergenerational Analyses

When analyzing policies and programs that result in GHG emission reductions, it is important to account for the difference between the social and private rate of return on any capital investment affected by the action. Society is not indifferent between a regulation that displaces consumption versus investment in equal amounts. Market distortions, in large part taxes on capital income, cause private returns on capital investments to be different from the social returns. In well-functioning capital markets, arbitrage opportunities will be dissipated, and the cost of investments will equal the present value of future private returns on those investments. Therefore, an individual forgoing consumption or investment of equal amounts as the result of a regulation will face an equal private burden. However, because the social rate of return on the investment is greater than the private rate of return, the overall social burden will be greater in the case where investment is displaced.

OMB's Circular A-4 points out that "the analytically preferred method of handling temporal differences between benefits and costs is to adjust all the benefits and costs to reflect their value in equivalent units of consumption and to discount them at the rate consumers and savers would normally use in discounting future consumption benefits" (OMB 2003). The damage estimates developed for use in the SC-GHG are estimated in consumption-equivalent terms. An application of OMB Circular A-4's guidance for regulatory analysis would then use the consumption discount rate to calculate the SC-GHG, while also developing a more complete estimate of social cost to account for the difference in private and social rates of return on capital for any investment displaced as a result of the regulation. This more complete estimate of social costs can be developed using either the shadow price of capital approach or by estimating costs in a general equilibrium framework, for example by using a computable general equilibrium model. In both cases, displaced investment would be converted into a flow of consumption equivalents.

In cases where the costs are not adjusted to be in consumption-equivalent terms, OMB's Circular A-4 recommends that analysts provide a range of estimates for net benefits based on two approaches. The first approach is based on using the consumption rate of interest to discount all costs and benefits. This approach is consistent with the case where costs are primarily borne as reduced consumption. The second approach, the social opportunity cost of capital (SOC) approach, focuses on the case where the main effect of a regulation is to displace or alter the use of capital in the private sector (OMB 2003). When interpreting the SOC approach from the point of view of whether to invest in a single government project, it is asking whether the benefits from the project would at least match the returns from investing the same resources in the private sector. Interpreting the approach from the standpoint of a benefit-cost analysis of regulation, the approach focuses on adjusting estimates of benefits downward by discounting at a higher rate to offset additional social costs not reflected in the private value of displaced investment.

Harberger (1972) derived a more general version of the social opportunity cost of capital approach, recognizing that policies will most likely displace a mix of consumption and investment and therefore a blended discount rate would be needed to adjust the benefits to account for the omitted costs. In his partial equilibrium approach, the blended discount rate is a weighted average of the consumption interest rate and social rate of return on capital, where the weights are the share of a policy's costs borne by consumption versus investment. This general result has been extended to the general equilibrium context by Sandmo and Drèze (1971) and Drèze (1974) and can be extended to account for changes in foreign direct investment (CEA 2017). This highlights that using the social rate of return for benefits and costs is at best creating a lower bound on the estimate of net benefits that would only be met in an extreme case

where regulatory costs fully displace investment. If the beneficial impacts of the regulation induce private investment whose social returns have not been quantified and fully converted to consumption equivalents, then the net benefits calculated using the social rate of return on capital is not even a lower bound. ²¹ Li and Pizer (2021) further generalize the SOC framework and demonstrate that temporal pattern of benefits is important and that when benefits occur far in the future discounting using the social rate of return on capital again is not even a lower bound on net benefits.

For regulations whose benefits and costs occur over a relatively short time frame, the range of net benefits computed using the two discounting approaches will be relatively narrow. Therefore, there is less risk in maintaining an uninformed prior over the share of regulatory costs that will displace investment and using the potential bounding cases for net benefits. However, for cases where the costs are borne early in the time horizon and benefits occur for decades or even centuries, such as with GHG mitigation, the two estimates of net benefits will differ significantly. In this case, the risk to society of maintaining an uninformed prior over the share of regulatory costs borne by investment is significantly higher. In turn, the preferred approach is to discount benefits using the consumption rate of interest and strive to provide a more complete measure of costs, accounting for displacement of investment whose social rate of return exceeds the private rate of return, either by using a shadow price of capital approach or a general equilibrium framework, like a computable general equilibrium model.

It is important to note that even if an appropriately specified blended SOC rate could be calculated based on the share of regulatory costs that are expected to displace investment that would not obviate the need to carefully consider issues of uncertainty and ethics when discounting in an intergenerational context, pointing to a lower rate.

For these reasons, the IWG is returning to the approach of calculating the SC-GHG based on the consumption rate of interest, consistent with the findings of the National Academies (2017)²².

3.2 New Evidence on the Consumption Discount Rate

The three discount rates selected by the IWG in 2010 are centered around the 3 percent estimate of the consumption interest rate published in OMB's Circular A-4 in 2003. That guidance was based on the real rate of return on 10-year Treasury Securities from the prior 30 years (1973 through 2002), which averaged 3.1 percent. Over the past four decades there has been a substantial and persistent decline in real interest rates (see Figure 1). Recent research has found that this decline has been driven by decreases in the equilibrium real interest rate (Bauer and Rudebusch 2020).

Re-estimating the consumption rate of interest following the same approach applied in Circular A-4, including using data from the most recent 30 years, yields a substantially lower result. The average rate

²¹ The SOC approach as outlined in OMB's Circular A-4 is most applicable to cases where the benefits are represented as consumption equivalents and costs may not be. If the benefits of the policy include the inducement of new private investment, discounting both benefits and costs at the social rate of return for capital is no longer appropriate. The results of Bradford (1975) show that in a case where regulatory costs are primarily borne through reduced consumption and the beneficial impacts of the policy may induce private investment the appropriate rate under the SOC approach could be below the consumption interest rate.

²² NAS (2017) stated "The estimates that result from the SC-IAMs are measured in consumption- equivalent units: thus, a discount rate that reflects how individuals trade off current and future consumption is defensible in this setting" (p. 236-7).

of return on inflation adjusted 10-year Treasury Securities over the last 30 years (1991-2020) is 2.0 percent. These rates are not without historic precedent, such that over the last 60 years the inflation adjusted 10-year Treasury Securities is 2.3 percent. Current real rates of returns below 2 percent are expected to persist. The U.S. Congressional Budget Office (CBO) in its September 2020 Long Term Budget Outlook forecasts real rates of return on 10-Year Treasury Securities to average 1.2 percent over the next 30 years (U.S. CBO 2020). This new information suggests that the consumption rate of interest is notably lower than 3 percent. CEA (2017) examined additional forecasts of 10-Year Treasury Securities and data on futures contracts, reaching the conclusion that the appropriate consumption discount rate should be at most 2 percent.

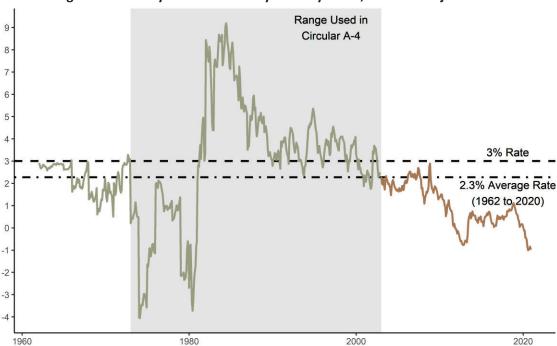


Figure 1: Monthly 10-Year Treasury Security Rates, Inflation-Adjusted²³

Several surveys have been conducted in recent years to elicit experts' views on the appropriate discount rates to use in an intergenerational context (e.g., Drupp et al. 2018; Howard and Sylvan 2020). For example, Drupp et al. (2018) offers confirming evidence that the economics profession generally agrees that the appropriate social discount rate is below 3 percent as reflected in the recent trends in data. They surveyed over 200 experts and found a "surprising degree of consensus among experts, with more than three-quarters finding the median risk-free social discount rate of 2 percent acceptable" (Drupp et al. 2018).²⁴

²³ Monthly 10-Year Treasury Security returns, adjusted for inflation. Real interest rates prior to 2003 (green line) are calculated by subtracting the annual rate of inflation as measured by the CPI-U from the nominal rate of return on 10-Year constant maturity Treasury Securities. Interest rates from 2003 onwards (brown line) are based on the 10-Year Treasury Inflation-Protected Securities.

²⁴ For a detailed explanation of discounting concepts and terminology see EPA's *Guidelines for Preparing Economic Analysis* (2010). https://www.epa.gov/environmental-economics/guidelines-preparing-economic-analyses

It is important to note that the new information pointing to a lower consumption rate of interest, lower than 3 percent, does not obviate the need to carefully consider issues of uncertainty and ethics when discounting in an intergenerational context.²⁵ If 2 percent was used as the consumption interest rate and adjusted for uncertainty using the results of Newell and Pizer (2003) as was done in the 2010 TSD, the process would yield a discount rate lower than 2 percent. Therefore, a consideration of discount rates below 3 percent, including 2 percent and lower, are warranted when discounting intergenerational impacts.

This is consistent with the 2003 recommendation in OMB's Circular A-4 that noted "[a]lthough most people demonstrate time preference in their own consumption behavior, it may not be appropriate for society to demonstrate a similar preference when deciding between the well-being of current and future generations" and found that certainty equivalent discount rates as low as 1 percent could be appropriate for intergenerational problems (OMB 2003). Similarly, if implementing a declining discount rate schedule to account for uncertainty (see next section), an updated consumption rate of interest, based on additional data presented above, may be a starting point for an update.

In light of the evidence and discussion on discount rates presented in this TSD and elsewhere, the recommendation from OMB's Circular A-4 to include further sensitivity analysis with lower discount rates when a rule has important intergenerational benefits or costs, and the direction to the IWG in E.O. 13990 to ensure that the SC-GHG reflect the interest of future generations, the IWG finds it appropriate as an interim recommendation that agencies may consider conducting additional sensitivity analysis using discount rates below 2.5%.

3.3 Analytic Consistency and Declining Discount Rates

While the consumption rate of interest is an important driver of the benefits estimate, it is uncertain over time, as may be observed in Figure 1. Weitzman (1998, 2001) showed theoretically and Newell and Pizer (2003) and Groom et al. (2005) confirmed empirically that discount rate uncertainty can have a large effect on net present values. A main result from these studies is that if there is a persistent element to the uncertainty in the discount rate (e.g., the rate follows a random walk), then it will result in an effective (or certainty-equivalent) discount rate that declines over time. This is because lower discount rates tend to dominate over the very long term (see Weitzman 1998, 1999, 2001; Newell and Pizer 2003; Groom et al. 2005; Gollier 2009; Summers and Zeckhauser 2008; Gollier and Weitzman 2010; Arrow et al. 2013; Cropper et al. 2014; and Arrow et al. 2014).

The proper way to specify a declining discount rate schedule remains an active area of research. One approach is to develop a stochastic model of interest rates that is empirically estimated and used to calculate the certainty equivalent declining discount rate schedule (e.g., Newell and Pizer 2003; Groom et al. 2007). An alternative approach is to use the Ramsey equation based on a forecast of consumption growth rates that accounts for uncertainty (e.g., Cropper et al. 2014; Arrow et al. 2013). If the shocks to consumption growth are positively correlated over time then the result of the Ramsey equation will be a certainty-equivalent discount rate schedule that declines over time (Goiller 2014). Others have argued for a less structural approach to specify a declining discount rate schedule (e.g., Weitzman 2001, the United

²⁵ For a more detailed explanation of ethical and uncertainty considerations around discounting see National Academies (2017) and the 2010 TSD (IWG 2010).

Kingdom's "Green Book" for regulatory analysis (HM Treasury 2020), the declining discount schedule in France (Lebègue 2005) and varying the discount rate based on the time period in Germany (Schwermer 2012, U.S. GAO 2020)). This approach uses a higher discount rate initially, like the current estimate of the consumption interest rate, but applies a graduated scale of lower discount rates further out in time.²⁶

Instead of explicitly specifying a declining discount rate schedule, the IWG in 2010 elected to use a constant but lower discount rate to capture the directional effect of the literature on discounting under uncertainty. Specifically, the IWG considered two declining discount rate schedules based on the meanreverting and random walk models from Newell and Pizer (2003) starting at a discount rate of 3 percent. The 2.5 percent discount rate selected by the IWG in 2010 reflected the midpoint between the average certainty equivalent discount rates of both models. The approach of using a lower, but constant, discount rate to capture the effect of uncertainty has led to inconsistency in regulatory analyses, where impacts occurring in a given year are discounted at different rates depending on whether they are related to climate change (Arrow et al. 2014). The National Academies (2017) and EPA's Science Advisory Board (2021) have recommended that the U.S. Government establish an explicit declining discount rate schedule that is applied to all regulatory impacts in an analysis to capture the effect of uncertainty on long-term discount rates, while also maintaining consistency across impact categories in the analysis. The IWG will consider the literature on declining discount rates and the recommendations of the National Academies (2017) and EPA's Science Advisory Board (2021) as it develops future updates to the SC-GHG. In the interim, the IWG is returning to the use of the 2.5, 3, and 5 percent discount rates in calculating the SC-GHG but recommends that agencies describe potential limitations in their analyses to ensure transparency. As noted above, agencies may also consider discount rates below 2.5 percent as part of a sensitivity analysis.

4 Interim Estimates of SC-CO₂, SC-CH₄, SC-N₂O

The interim SC-GHG estimates presented in this TSD rely on the same models and harmonized inputs for the socioeconomic emissions scenarios and equilibrium climate sensitivity distribution used for USG SC-GHG estimates since 2013. Specifically, the SC-GHG estimates rely on an ensemble of three IAMs: Dynamic Integrated Climate and Economy (DICE) 2010 (Nordhaus 2010); Climate Framework for Uncertainty, Negotiation, and Distribution (FUND) 3.8 (Anthoff and Tol 2013a, 2013b); and Policy Analysis of the Greenhouse Gas Effect (PAGE) 2009 (Hope 2013). IAMs are useful because they combine climate processes, economic growth, and feedback between the climate and the global economy into a single modeling framework. They gain this advantage at the expense of a more detailed representation of underlying climatic and economic systems. DICE, PAGE, and FUND all take stylized, reduced-form approaches and have been widely used in the economic and scientific literature since the 1990s. They are periodically updated by the model developers, but as discussed further in Section 5, the versions of the three models used in the 2013 and 2016 TSDs do not reflect the tremendous increase in the scientific and economic understanding of climate-related damages that has occurred in the past decade. The three IAMs

²⁶ For instance, the United Kingdom applies a discount rate of 3.5 percent to the first 30 years; 3 percent for years 31 - 75; 2.5 percent for years 76 - 125; 2 percent for years 126 - 200; 1.5 percent for years 201 - 300; and 1 percent after 300 years. As a sensitivity, it recommends a discount rate of 3 percent for the first 30 years, also decreasing over time.

were run using a common set of assumptions in each model for future population, economic, and GHG emissions growth, as well as equilibrium climate sensitivity (ECS) – a measure of the globally averaged temperature response to increased atmospheric CO_2 concentrations. The socioeconomic and emission projections included five reference scenarios based on the Stanford Energy Modeling Forum EMF-22 modeling exercise (Clarke, et al. 2009; Fawcett, et al. 2009). The models were run using a probability distribution for ECS, calibrated to the Intergovernmental Panel on Climate Change's (IPCC) Fourth Assessment Report findings using the Roe and Baker (2007) distribution. Details on these versions of the IAMs and the harmonized inputs are presented in the 2016 TSD and Addendum and 2010 TSD. (IWG 2010, 2016a, 2016b). The 2016 Addendum also describes the methodology used to calculate the SC-CH₄ and SC-N₂O estimates in greater detail.²⁷ Finally, for the reasons set forth in Section 3 above, the interim estimates were based on three constant discount rates of 2.5, 3, and 5 percent.

The combination of three models and five scenarios produced 15 separate frequency distributions of SC-GHG estimates for each discount rate in a given year, with each distribution consisting of 10,000 estimates based on draws from the standardized ECS distribution (as well as distributions of parameters treated as uncertain in two of the models (FUND and PAGE)). For each discount rate, the IWG combined the distributions across models and socioeconomic emissions scenarios (applying equal weight to each) and then selected a set of four values for use in benefit-cost analyses: an average value resulting from the model runs for each of three discount rates (2.5%, 3%, and 5%), plus a fourth value, selected as the 95th percentile of estimates based on a 3 percent discount rate. The fourth value was included to provide information on potentially higher-than-expected economic impacts from climate change, conditional on the 3% estimate of the discount rate. For this purpose, the SC-GHG value for the 95th percentile at a 3 percent discount rate was presented.²⁸ For the purposes of capturing the uncertainties involved in analyses, the IWG emphasized previously and emphasizes in this TSD the importance and value of including all four SC-GHG values. In particular, values based on lower discount rates are consistent with the latest scientific and economic understanding of discounting approaches relevant for intergenerational analysis (described in Section 3).

Tables 1-3 show the four selected values for SC-CO₂, SC-CH₄, and SC-N₂O, respectively, in five-year increments from 2020 to 2050. These estimates are reported in 2020 dollars but are otherwise identical to those presented in the previous version of the TSD and its Addendum, released in August 2016.²⁹ The

 $^{^{27}}$ The IWG calculated the SC-CH₄ and SC-N₂O estimates following the approach used in Marten et al. (2015). In order to develop SC-CH₄ and SC-N₂O estimates consistent with the methodology underlying the SC-CO₂ estimates, Marten et al. (2015) needed to augment the IWG modeling framework in two respects: (1) augment the climate model of two of the IAMs to explicitly consider the path of additional radiative forcing from a CH₄ or N₂O perturbation, and (2) add more specificity to the assumptions regarding post-2100 baseline CH₄ and N₂O emissions. See IWG (2016b) for more discussion of these two modeling modifications and the peer review and public comment processes accompanying their development.

²⁸ A detailed set of percentiles by model and scenario combination and additional summary statistics for the 2020 values is available in the 2016 TSD and Addendum (IWG 2016a, 2016b).

 $^{^{29}}$ The values in Tables 1-3 are the same as those reported in the 2016 TSD and Addendum adjusted for inflation to 2020 dollars using the annual GDP Implicit Price Deflator values in U.S. Bureau of Economic Analysis (BEA) NIPA Table 1.1.9: 113.626 (2020)/ 92.486 (2007) = 1.228575 (U.S. BEA 2021). Values of SC-CO₂ presented in this TSD are rounded to the nearest dollar; SC-CH₄ and SC-N₂O are rounded to two significant figures. The annual unrounded estimates are available on OMB's website for use in regulatory and other analyses: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs.

ed using linear interpolation between ne full set of model results are available

PageID 4398

full set of annual SC-GHG values between 2020 and 2050, calculated using linear interpolation between the numbers shown in Tables 1-3, is reported in the Appendix and the full set of model results are available on the OMB website.³⁰ The SC-GHG estimates increase over time within the models – i.e., the societal harm from one metric ton emitted in 2030 is higher than the harm caused by one metric ton emitted in 2025 – because future emissions produce larger incremental damages as physical and economic systems become more stressed in response to greater climatic change, and because GDP is growing over time and many damage categories are modeled as proportional to GDP.

Table 1: Social Cost of CO₂, 2020 – 2050 (in 2020 dollars per metric ton of CO₂)³¹

	Discount Rate and Statistic			
Emissions	5%	3%	2.5%	3% 95 th Percentile
Year	Average	Average	Average	33 T CTCCTTCTC
2020	14	51	76	152
2025	17	56	83	169
2030	19	62	89	187
2035	22	67	96	206
2040	25	73	103	225
2045	28	79	110	242
2050	32	85	116	260

Table 2: Social Cost of CH₄, 2020 – 2050 (in 2020 dollars per metric ton of CH₄)

	Discount Rate and Statistic			
Emissions	5%	3%	2.5%	3%
Year	Average	Average	Average	95 th Percentile
2020	670	1500	2000	3900
2025	800	1700	2200	4500
2030	940	2000	2500	5200
2035	1100	2200	2800	6000
2040	1300	2500	3100	6700
2045	1500	2800	3500	7500
2050	1700	3100	3800	8200

³⁰ https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs

³¹ The values reported in this TSD are identical to those reported in the 2016 TSD adjusted for inflation to 2020 dollars using the annual GDP Implicit Price Deflator values in the U.S. Bureau of Economic Analysis' (BEA) NIPA Table 1.1.9: 113.626 (2020)/ 92.486 (2007) = 1.228575 (U.S. BEA 2021). The IWG combined the distributions across models and socioeconomic emissions scenarios for each of three discount rates (2.5%, 3%, and 5%), plus a fourth value, selected as the 95th percentile of estimates based on a 3 percent discount rate. Values of SC-CO₂ are rounded to the nearest dollar; SC-CH₄ and SC-N₂O are rounded to two significant figures. The annual unrounded estimates are available on OMB's website for use in regulatory and other analyses: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs.

Table 3: Social Cost of N₂O, 2020 – 2050 (in 2020 dollars per metric ton of N₂O)

	-			
	Discount Rate and Statistic			
Emissions	5%	3%	2.5%	3%
Year	Average	Average	Average	95 th Percentile
2020	5800	18000	27000	48000
2025	6800	21000	30000	54000
2030	7800	23000	33000	60000
2035	9000	25000	36000	67000
2040	10000	28000	39000	74000
2045	12000	30000	42000	81000
2050	13000	33000	45000	88000

Multiplying the SC-GHG in year t by the change in emissions in year t yields the monetized value of future emission changes from a year t perspective. This value must then be discounted to the present before being included in an analysis. For this purpose, the monetized value of future emission changes should be discounted at the same rate used to calculate the initial SC-GHG to ensure internal consistency—i.e., future damages from climate change using the SC-GHG at 2.5 percent should be discounted to the base year of the analysis using the same 2.5 percent rate.

As noted above, to correctly assess the total climate damages to U.S. citizens and residents, an analysis must account for both the impacts that occur within U.S. borders and spillover effects from climate action elsewhere. For the reasons discussed in Section 2 above, estimates focusing on the climate impacts occurring within U.S. borders are an underestimate of the benefits of GHG mitigation accruing to U.S. citizens and residents and, therefore, are not equivalent to a domestic estimate of the SC-GHG. (Section 2 also discusses why analyses should center their attention on a global measure of the SC-GHG). Additionally, models differ in their treatment of regional damages³² with one of the model developers recently noting that regional damages are "both incomplete and poorly understood" (Nordhaus 2017). The IWG further notes that the domestic focused SC-GHG estimates used under E.O. 13783³³ did not

³² Both the PAGE and FUND model contain a U.S. region and so the damages for this region are reported directly for those models. The DICE 2010 model does not explicitly include a separate U.S. region in the model. For the domestic focused SC-GHG estimates used under E.O. 13783, the DICE model damages occurring within U.S. borders were approximated as 10 percent of the global estimate from the DICE model runs, based on the results from a regionalized version of the model (RICE 2010) reported in Table 2 of Nordhaus (2017). Although the regional shares reported in Nordhaus (2017) are specific to SC-CO₂, they were also used in approximating the share of marginal damages from CH₄ and N₂O emissions occurring within U.S. borders. Direct transfer of the U.S. share from the SC-CO₂ likely understate the U.S. share of the IWG global SC-CH₄ estimates based on DICE due to the combination of three factors: a) regional damage estimates are known to be highly correlated with output shares (Nordhaus 2017, 2014), b) the U.S. share of global output decreases over time in all five EMF-22 based socioeconomic scenarios used for the model runs, and c) the bulk of the temperature anomaly (and hence, resulting damages) from a perturbation in emissions in a given year will be experienced earlier for CH₄ than CO₂ due to the shorter lifetime of CH₄ relative to CO₂.

³³ For emissions occurring in 2020, the average estimates of marginal damages occurring within the U.S. borders for CO₂, CH₄, and N₂O emissions across all model runs that were used in 2017-2020 regulatory analyses were \$7/mtCO₂,

benefit from a consensus-based IWG process, were not documented in a dedicated TSD, subjected to a SC-GHG specific notice and comment period, or considered by National Academies in their 2017 review. The IWG will request public comments on the new information presented in this TSD, as well as other topics and issues the IWG will address as we develop the next set of updates (see Section 6).

4.1 Treatment of Uncertainty

Uncertainty about the value of the SC-GHGs is in part inherent, as with any analysis that looks into the future, but it is also driven by current data gaps associated with the complex physical, economic, and behavioral processes that link GHG emissions to human health and well-being. Some sources of uncertainty pertain to aspects of the natural world, such as quantifying the physical effects of greenhouse gas emissions on Earth systems. Other sources of uncertainty are associated with current and future human behavior and well-being, such as population and economic growth, GHG emissions, the translation of Earth system changes to economic damages, and the potential extent and costs of adaptation. It is important to note that even in the presence of uncertainty, scientific and economic analysis can provide valuable information to the public and decision makers. Such uncertainty should, however, be acknowledged, communicated as clearly as possible, and taken into account in the analysis whenever possible.

The 2016 TSD and the 2017 National Academies report provide detailed discussions of the ways in which the modeling underlying the development of the SC-GHG estimates addressed quantified sources of uncertainty.

In developing the SC-CO₂ estimates, the IWG considered various sources of uncertainty through a combination of a multi-model ensemble, probabilistic analysis, and scenario analysis. For example, the three IAMs used collectively span a wide range of Earth system and economic outcomes to help reflect the uncertainty in the literature and in the underlying dynamics being modeled. The use of an ensemble of three different models is also intended to, at least partially, address the fact that no single model includes all of the quantified economic damages. It also helps to reflect structural uncertainty across the models, which is uncertainty in the underlying relationships between GHG emissions, Earth systems, and economic damages that are included in the models. Bearing in mind the different limitations of each model (discussed in the 2010 TSD) and lacking an objective basis upon which to differentially weight the models, the three IAMs were given equal weight in the analysis.

The IWG used Monte Carlo techniques to run the IAMs a large number of times. In each simulation the uncertain parameters are represented by random draws from their defined probability distributions. In all three models the equilibrium climate sensitivity is treated probabilistically based on the probability distribution described in the 2010 TSD. The equilibrium climate sensitivity is a key parameter in this

\$190/mtCH₄, and \$2,300/mtN₂O (in 2020 dollars), respectively, using a 3 percent discount rate, and \$1/mtCO₂, \$59/mtCH₄, and \$380/mtN₂O (in 2020 dollars) using a 7 percent discount rate. These values increased over time; for 2050 emissions, the average estimates of marginal damages occurring within the U.S. borders are \$11/mtCO₂, \$380/mtCH₄, and \$4,000/mtN₂O (in 2020 dollars) using a 3% discount rate and \$3/mtCO₂, \$160/mtCH₄, and \$1,000/mtN₂O (in 2020 dollars) using a 7% discount rate. Using the same approach with a 2.5 percent discount rate, the average estimates of marginal damages occurring within the U.S. borders of CO₂, CH₄, and N₂O for emissions in 2020 are \$10/mtCO₂, \$240/mtCH₄, and \$3,300/mtN₂O (in 2020 dollars), respectively; for 2050 emissions, these values increase to \$15/mtCO₂, \$450/mtCH₄, and \$5,300/mtN₂O (in 2020 dollars).

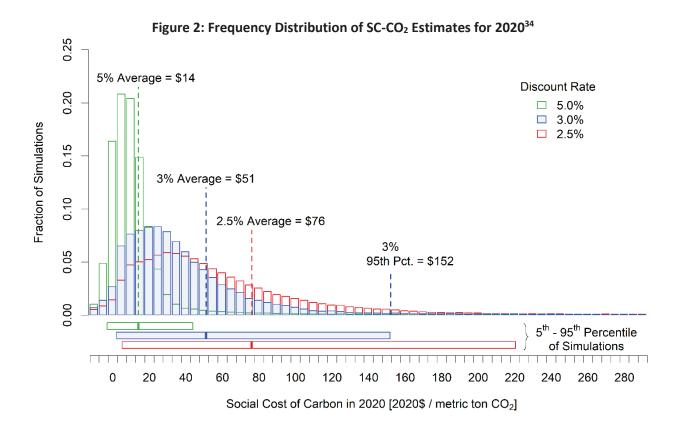
analysis because it helps define the strength of the climate response to increasing GHG concentrations in the atmosphere. In addition, the FUND and PAGE models define many of their parameters with probability distributions instead of point estimates. For these two models, the model developers' default probability distributions are maintained for all parameters other than those superseded by the IWG's harmonized inputs (i.e., equilibrium climate sensitivity, socioeconomic and emissions scenarios, and discount rates). More information on the uncertain parameters in PAGE and FUND is presented in Appendix C of the 2016 TSD (IWG 2016a).

Finally, based on the review of the literature, the IWG chose discount rates that reflect reasonable judgements under both prescriptive and descriptive approaches to intergenerational discounting. As discussed in the 2010 TSD, in light of disagreement in the literature on the appropriate discount rate to use in this context and uncertainty about how rates may change over time, the IWG selected three certainty-equivalent constant discount rates to span a plausible range: 2.5, 3, and 5 percent per year. However, unlike the approach taken for consolidating results across models and socioeconomic and emissions scenarios, the SC-GHG estimates are not pooled across different discount rates because the range of discount rates reflects both uncertainty and, at least in part, different policy or value judgements.

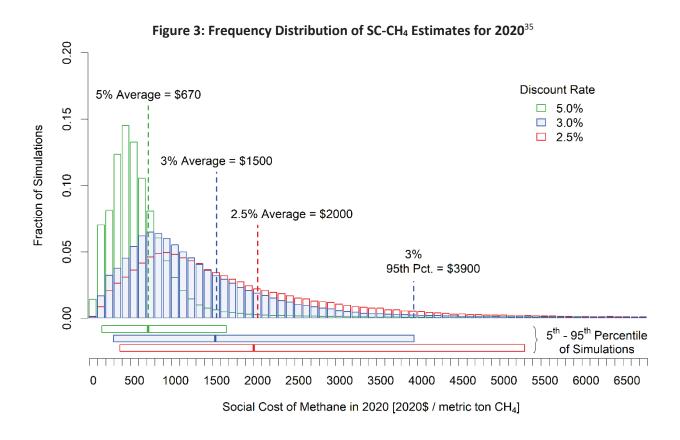
The outcome of accounting for various sources of uncertainty using the approaches described above is a frequency distribution of the SC-CO₂ estimates for emissions occurring in a given year for each of the three discount rates. These frequency distributions reflect the uncertainty around the input parameters for which probability distributions were defined, as well as from the multi-model ensemble and socioeconomic and emissions scenarios where probabilities were implied by the equal weighting assumption. It is important to note that the probability distribution for the SC-GHG calculated using the modeling approach outlined above does not fully characterize uncertainty about the SC-GHG due to impact categories omitted from the models and sources of uncertainty that have not been fully characterized due to data limitations. To name just one example of many known GHG-induced damages omitted in the three IAMs, none of the models include damages associated with ocean acidification, and, therefore, naturally the models do not reflect uncertainty as to the potential severity of those damages.

Figures Figure 2 through Figure 4 present the frequency distribution of the interim SC-CO₂, SC-CH₄, and SC-N₂O estimates, respectively, for emissions in 2020 and for each discount rate. Each distribution represents 150,000 estimates based on 10,000 simulations for each combination of the three models and five socioeconomic and emissions scenarios. In general, the distributions are skewed to the right and have long right tails, which tend to be longer for lower discount rates. To highlight the difference between the impact of the discount rate on the SC-GHG and other quantified sources of uncertainty, the bars below the frequency distributions provide a symmetric representation of quantified variability in the SC-GHG estimates conditioned on each discount rate. The full set of SC-GHG results through 2050 is available on OMB's website.

As illustrated by the frequency distributions in Figures Figure 2 through Figure 4, the assumed discount rate plays a critical role in the ultimate estimate of the SC-GHG. As explained in Section 3, this is because GHG emissions today continue to impact society far out into the future, so with a higher discount rate, costs that accrue to future generations are weighted less, resulting in a lower estimate. As discussed in Section 3.1, new data and evidence strongly suggest that the consumption interest rate is likely to be less than 3, near 2 percent or lower.



³⁴ Although the distributions and numbers in Figure 2 are based on the full set of model results (150,000 estimates for each discount rate), for display purposes the horizontal axis is truncated with 0.81 percent of the estimates falling below the lowest bin displayed and 3.56 percent of the estimates falling above the highest bin displayed.



³⁵ Although the distributions and numbers in Figure 3 are based on the full set of model results (150,000 estimates for each discount rate), for display purposes the horizontal axis is truncated with 0.12 percent of the estimates falling below the lowest bin displayed and 2.84 percent of the estimates falling above the highest bin displayed.

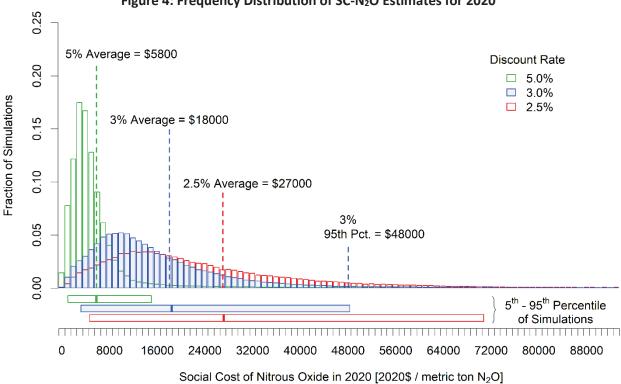


Figure 4: Frequency Distribution of SC-N₂O Estimates for 2020³⁶

While the figures above reflect the uncertainties that are explicitly considered in a quantitative manner, there are other areas of uncertainty that are not quantitatively reflected in the interim SC-GHG estimates. The scientific and economics literature has further explored known sources of uncertainty related to estimates of the SC-GHG. For example, published studies explore the sensitivity of IAMs and the resulting SC-GHG estimates to different assumptions embedded in the models (see, e.g., Hope 2013, Anthoff and Tol 2013a, and Nordhaus 2014). However, there remain additional sources of uncertainty that have not been fully characterized and explored due to data limitations and lack of consensus in the scientific or economic literature about how to represent them. Additional research is needed to expand the quantification of various sources of uncertainty in estimates of the SC-GHG (e.g., developing explicit probability distributions for more inputs pertaining to climate impacts and their valuation).

4.2 Other Modeling Limitations

The interim SC-GHG estimates presented in this TSD have a number of limitations, as would be expected for any modeling exercise that covers such a broad scope of scientific and economic issues across the complex global landscape. These include the incomplete treatment of catastrophic and non-catastrophic impacts in the IAMs, their incomplete treatment of adaptation and technological change, the incomplete way in which inter-regional and intersectoral linkages are modeled, uncertainty in the extrapolation of

³⁶ Although the distributions and numbers in Figure 4 are based on the full set of model results (150,000 estimates for each discount rate), for display purposes the horizontal axis is truncated with 0.1 percent of the estimates falling below the lowest bin displayed and 2.85 percent of the estimates falling above the highest bin displayed.

damages to high temperatures, and inadequate representation of the relationship between the discount rate and uncertainty in economic growth over long time horizons.

There are newer versions available of each of the IAMs used to calculate the interim SC-GHG estimates in this TSD that offer improvements in some of these areas beyond the version of the models used for the interim estimates. For example, the latest version of the PAGE model, PAGE-ICE (Yumashev et al. 2019, Yumashev 2020), extends PAGE09 (Hope 2013) with representation of two nonlinear Arctic feedbacks (permafrost carbon feedback and surface albedo feedback) on the global climate system and economy, among other changes. The newest version of the DICE model, DICE2016-R3 (Nordhaus 2017), includes numerous updates, including changes to the carbon cycle (to better simulate the long-run behavior of larger models with full ocean chemistry) and updated methods for estimating economic activity.³⁷ At comparable discount rates, DICE2016-R3 would result in SC-CO2 estimates roughly twice that of the interim estimates presented in this TSD. For example, using a 3% constant discount rate and other IWG modeling assumptions, DICE2016-R3 yields an average SC-CO₂ of \$104 (2018 international dollars) for 2020 emissions (Nordhaus 2019a). However, even DICE2016 and PAGE-ICE do not include all of the important physical, ecological, and economic impacts of climate change recognized in the climate change literature and the science underlying their damage functions lags behind the most recent research. Likewise, the socioeconomic and emissions scenarios used as inputs to the models in this TSD do not reflect new information from the last decade of scenario generation or the full range of projections.

The modeling limitations discussed above do not all work in the same direction in terms of their influence on the SC-GHG estimates. However, it is the IWG's judgment that, taken together, the limitations suggest that the interim SC-GHG estimates presented in this TSD likely underestimate the damages from GHG emissions. In particular, the IPCC's Fourth Assessment Report (IPCC 2007), which was the most current IPCC assessment available at the time when the IWG decision over the ECS input was made, concluded that SC-CO₂ estimates "very likely...underestimate the damage costs" due to omitted impacts. Since then, the peer-reviewed literature has continued to support this conclusion, as noted in the IPCC's Fifth Assessment report (IPCC 2014) and other recent scientific assessments (e.g., IPCC 2018, 2019a, 2019b; U.S. Global Change Research Program (USGCRP) 2016, 2018; and National Academies 2016b, 2019). These assessments confirm and strengthen the science, updating projections of future climate change and documenting and attributing ongoing changes. For example, sea level rise projections from the IPCC's Fourth Assessment report ranged from 18 to 59 centimeters by the 2090s relative to 1980-1999, while excluding any dynamic changes in ice sheets due to the limited understanding of those processes at the time (IPCC 2007). A decade later, the Fourth National Climate Assessment projected a substantially larger sea level rise of 30 to 130 centimeters by the end of the century relative to 2000, while not ruling out even more extreme outcomes (USGCRP 2018). Section 5 briefly previews some of the recent advances in the

³⁷ Relative to the previous version of DICE, DICE2013, the DICE2016 updates to the carbon cycle and the methods for estimating economic activity had the greatest impact on the SC-CO₂. Based on Archer et al. (2009), DICE2016's three-box carbon cycle model aims to better simulate the long-run behavior of larger models with full ocean chemistry. In measuring economic activity, one of the important changes in DICE2016 was to move from market exchange rates to measures adjusted for purchasing power parity when comparing monetary values across countries. See Nordhaus (2017, 2019a) for more discussion of these and other updates included in DICE2016-R3. Nordhaus has also recently explored side extensions of DICE2016. For example, DICE-GIS extends DICE2016 to include representation of sea level rise from melting of the Greenland Ice Sheet (Nordhaus 2019b, Pizer 2019).

scientific and economic literature that the IWG is actively following and that could provide guidance on, or methodologies for, addressing some of the limitations with the interim SC-GHG estimates.

5 Scientific and Economic Advances

The research community has made considerable progress in developing new data and methods that will provide a path forward for bringing the USG SC-GHG estimates closer to the current frontier of climate science and economics and could address many of the National Academies' (2017) recommendations. This research since 2010/2013 has advanced knowledge regarding each key component in the process of estimating the SC-GHG. This TSD does not intend to provide a detailed review of all these advancements, but this section does highlight some of the key research and new information that the IWG will be reviewing as it works to improve the SC-GHG estimates. As part of the process for updating the SC-GHG estimates by January 2022, the IWG will survey the scientific literature, including the economic literature, to identify advances to address the National Academies (2017) recommendations.

Climate system representation. There have been advancements in climate science since the publication of the IPCC's Fourth Assessment Synthesis report (IPCC 2007), which was the basis for the IWG decision on what equilibrium climate sensitivity (ECS) input to use in the IAM model runs. The conclusions of recent scientific assessments, e.g., from the IPCC (2014, 2018, 2019a, 2019b), the USGCRP (2016, 2018), and the National Academies (2016b, 2019), confirm and strengthen the science, updating projections of future climate change and documenting and attributing ongoing changes. In addition, there are reduced complexity climate models that could offer meaningful improvement over current representation of climate dynamics in existing IAMs (Nicholls et al. 2020). For example, the National Academies (2017) stated that the FAIR model (Smith et al., 2018) satisfies all of the criteria set by National Academies (2017) recommendations related to the representation of climate system dynamics, generates projections of future warming consistent with more complex, state of the art models, can be used to accurately characterize current best understanding of uncertainty, and can be easily implemented and transparently documented. Reduced complexity sea level rise models are also being developed that can provide projections for damage functions that require sea level estimates, including the contributions of thermal expansion and glacial and ice sheet melting based on recent scientific research (e.g., Wong et al. 2017).

Damage functions. At the core of IAMs are "damage functions" that map global mean temperature changes and other physical impacts of climate change into economic (both market³⁸ and nonmarket³⁹) damages. Relative to how much progress has been made in modeling and improving our understanding of climate system dynamics and the physical impacts resulting from temperature change, efforts involved in, and the public resources targeted at, understanding how these physical changes translate into economic impacts have been significantly smaller (Auffhammer 2018). Even so, as illustrated in Figure 5, in the time since the versions of the IAMs used in this TSD were published, there has been an explosion of research on climate impacts and damages.

³⁸ Examples of market damages include changes in net agricultural productivity, energy use, and property damage from increased flood risk.

³⁹ Examples of nonmarket damages include services that natural ecosystems provide to society.

FUND 40 not included Number of studies 30 20 10 0 1986 1990 1994 1998 2002 2006 2010 2014

Figure 5. New Research on Climate Impacts⁴⁰

Source: Greenstone (2016).

Several efforts are underway to draw on recent literature for improving damage functions and to generate new damage estimates. In particular, the Climate Impact Lab is undertaking an effort to quantify and monetize damages at a fine spatial scale, relying on rigorous empirical methods to develop plausibly causal estimates for several sectors, including health (Carleton et al. 2020), energy (Rode et al. 2021), labor productivity (Rode et al. 2020), agriculture, conflict, and sea level rise. Other research efforts have sought to update the damage function for one sector in an existing IAM based on an updated review of the empirical literature on climate impacts pertaining to that sector (e.g., Moore et al. (2017) for agriculture damages in the FUND model). Damage functions specific to impacts within the U.S. have also been developed and improved for a number of sectors, such as impacts on coastal property, mortality due to extreme temperatures, transportation infrastructure, electricity supply and demand, water quality, recreation, and allergies (Neumann et al. 2020) and impacts of climate change on air quality and human health (Fann et al. 2021). There is also an emerging literature focused on incorporating interactions among

⁴⁰ In many cases, the three IAMs used different studies for calibration. This is particularly true of FUND, which used studies relating to different subsectors of the model, whereas DICE and PAGE did not have as detailed a sectoral breakdown. That means that summing across these different models is likely valid in all but a few isolated cases. The blue bars include studies uncovered from a comprehensive literature review in the economics literature (and a few others in public health or relevant disciplines) by the Climate Impact Lab (CIL) through early 2016. Each of the studies counted in blue was determined by CIL to have employed a research design that allowed for the causal interpretation of results (Greenstone 2016).

⁴¹ The Climate Impact Lab is a multidisciplinary collaboration of climate scientists, economists, computational experts, researchers, analysts, and students working to build empirically derived, local-level estimates of climate change damages and an empirically based SC-CO₂. More information on the Climate Impact Lab can be found at: http://www.impactlab.org/.

regions and impacts. For example, biodiversity loss (e.g., animal pollinators) as a result of climate-driven ecosystem stress could amplify impacts of climate change on agriculture. See National Academies (2017) for more discussion of recent research addressing these and other types of interactions.

Related to the development of damage functions, damages from climate change are uncertain and hence pose additional risks. Reductions in GHG emissions reduce not only expected damages, but also reduce the uncertainty and risks of catastrophic events. Evaluating the damages using the mean outcome does not account for the benefits of reducing uncertainty. Some researchers have raised the need to include this consideration in the SC-GHG (e.g., Carleton and Greenstone 2021) consistent with the observation that individuals are regularly willing to pay for insurance against bad outcomes.

Furthermore, E.O. 13990 instructs the IWG to consider how best to reflect environmental justice and intergenerational equity concerns in assessing climate damages. In the context of climate policy, equity considerations are discussed by economists, ethicists, and others in several ways: distributional effects within a specific country, effects across countries, and intergenerational equity impacts. Economists, ethicists, and others have proposed potential ways to incorporate equity into the SC-GHG. For example, IAM developers have introduced the use of equity weights potentially incorporate these concerns (e.g., Hope 2008; Anthoff and Emmerling 2019).

Socioeconomic and Emissions Projections. The socioeconomic and emissions projections underlying current USG SC-GHG estimates were developed around 2007. Since that time, there have been efforts to develop updated baseline scenarios. Several researchers have started using deterministic scenarios available as part of the IPCC's Fifth Assessment Report Working Group 3 database and the Shared Socioeconomic Pathways (SSPs) linked with the Representative Concentration Pathway (RCP) emissions scenarios (Riahi et al. 2017 and Moss et al. 2010) as benchmark scenarios. Resources for the Future (RFF) has engaged in a research effort to implement each of the National Academies' (2017) recommendations, in collaboration with research partners. One part of this effort is focused on developing probability distributions for future paths of population, GDP, and emissions via using econometrics and expert elicitation techniques. For example, economic growth projections are being built off the results of a formal expert elicitation of leading growth economists together with recent research by Muller, Stock and Watson (2020), who have refined a foundational statistical methodology for generating long-run projections of economic growth at the country level. RFF plans to make these probabilistic scenarios easily usable on Mimi.jl, an open-source modular computing platform used for creating, running, and performing analyses on IAMs. As

Discounting. Another area of active research relates to discounting, including the best available evidence on the consumption rate of interest and the application of discount rates to regulations in which some costs and benefits accrue intra-generationally while others accrue inter-generationally. As described in Section 3.2, new empirical evidence suggests that consumption interest rates are now below the previous estimate of 3 percent presented in OMB's Circular A-4. This empirical evidence is also consistent with long-term forecasts by the Congressional Budget Office, suggesting these lower rates will persist (U.S. CBO

34

⁴² For more information on RFF's Social Cost of Carbon Initiative, see: https://www.rff.org/topics/scc/.

⁴³ Mimi.jl was developed by a team of researchers at UC Berkeley led by David Anthoff in response to a core recommendation from the National Academies (2017) to create an integrated modular approach to draw more readily on expertise from the wide range of scientific disciplines relevant to SC-CO₂ estimation. Mimi.jl provides an interface for defining components and building models in a modularized, transparent way (mimiframework.org).

2020). Future updates to the SC-GHGs estimates will need to reflect the best available evidence from the time series of risk-free rate data and expectations of these rates into the future.

As described in Section 3.3 uncertainty in the discount rate over time yields a declining certainty-equivalent discount rate schedule and can have a dramatic effect on the size of the SC-GHG. While this is not a new theoretical result, new literature has proposed methods for how to incorporate discount rate uncertainty (e.g., Arrow et al., 2013; Cropper et al., 2014) and other nations have implemented declining discount rate schedules for policy analysis (e.g., United Kingdom, France, and Germany). Recent recommendations by the National Academies (2017) and EPA's Science Advisory Board (2021) have encouraged the development and use of a declining certainty-equivalent discount rate schedule as theoretically appropriate and as a method of introducing consistency into analyses that have both near-term and long-term impacts.

In light of new science and evidence, including many of those highlighted in the paragraphs above, other jurisdictions are already considering or have implemented some of the scientific and economic advances discussed above. For example, some states that use SC-GHG estimates in policy analysis have recently updated their approach to discounting based on the increasing evidence that a 3% discount rate is too high for intergenerational analysis. In December 2020, New York issued guidance recommending state agencies use SC-GHG estimates based the same IWG modeling and input decisions as presented in this TSD but with lower discount rates: 2 percent in central scenarios (\$125/mtCO₂ for 2020 emissions (2020 dollars), along with sensitivity analysis at 1 percent and 3 percent (New York Department of Environmental Conservation 2020). Similarly, in Washington state an April 2019 law required utilities to use estimates based on the IWG methodology with a 2.5% discount rate when developing "lowest-cost analyses" for its integrated resource planning and clean energy plans.⁴⁴

Canada is also in the process of updating the SC-GHG estimates used in their regulatory analyses. While the update is underway, they are continuing to use the estimates they adopted in 2016 (which are an adaptation of the IWG global SC-GHG estimates presented in this TSD) as well as a side analysis based on more recent estimates from the academic literature. Based on their review of the literature and latest climatological and economic evidence, they present their current estimates as a "likely underestimate [of] climate-related damages to society" and the side analysis as a way "to illustrate a range of plausible values if the Department were to update its [social cost of carbon] estimate based on new versions of the models currently used."⁴⁵ Specifically, the side analysis includes SC-CO₂ estimates based on DICE2016 and PAGE-ICE (\$135 and \$440/mtCO₂ for 2020 emissions (2019 Canadian dollars)).⁴⁶

The IWG will consider the new science and evidence as it works towards a more comprehensive update, including the new research and information described in this section.

⁴⁴ Wash. Sen. Bill. 5116 (signed by Gov. Inslee on May 7, 2019). More information on Washington and other states' use of SC-GHG estimates is compiled by the Institute for Policy Integrity at NYU School of Law (see http://www.costofcarbon.org/states) and discussed in U.S. GAO (2020).

⁴⁵ Proposed Clean Fuel Regulations (published for public comment on 12/20/20) http://www.gazette.gc.ca/rp-pr/p1/2020/2020-12-19/pdf/g1-15451.pdf.

⁴⁶ Proposed Clean Fuel Regulations (published for public comment on 12/20/20) http://www.gazette.gc.ca/rp-pr/p1/2020/2020-12-19/pdf/g1-15451.pdf.

6 Path Forward

E.O. 13990 reaffirms that "[a]n accurate social cost is essential for agencies to accurately determine the social benefits of reducing greenhouse gas emissions when conducting cost-benefit analyses of regulatory and other actions" (E.O. 13990 2021). The E.O. instructs the IWG to publish interim SC-CO₂, SC-CH₄, and SC-N₂O estimates (collectively, SC-GHG estimates) within 30 days and to publish a set of final estimates by no later than January 2022.⁴⁷ In doing so, the E.O. instructs the IWG to consider the recommendations of the National Academies of Science, Engineering, and Medicine as reported in Valuing Climate Damages: Updating Estimation of the Social Cost of Carbon Dioxide (2017) and other pertinent scientific literature; solicit public comment; engage with the public and stakeholders; seek the advice of ethics experts; and ensure that the SC-GHG estimates reflect the interests of future generations in avoiding threats posed by climate change.

In developing the SC-GHG estimates in 2010, 2013, and 2016 the IWG used consensus-based decision making, relied on peer-reviewed literature and models, and took steps to disclose limitations and incorporate new information by considering public comments and revising the estimates as updated research became available (U.S. GAO 2014). Going forward the IWG commits to maintaining a consensus driven process for making evidence-based decisions that are guided by the best available science and input from the public, stakeholders, and peer reviewers.

While the IWG assesses the current state of the science in each component of the SC-GHG modeling exercise, the IWG is beginning by asking for public comment on how best to incorporate the latest, peer reviewed science to develop an updated set of SC-GHG estimates. The IWG will soon issue a Federal Register notice with a detailed set of requests for public comments on the new information presented in this TSD, as well as other topics and issues the IWG will address as we develop the next set of updates. Among other things, the IWG will ask for public comment on how to incorporate the best available science in the updated SC-GHG estimates, due to be published by January 2022, and how to incorporate the recommendations of the National Academies (2017).

References

Anthoff, D., and J. Emmerling. 2019. Inequality and the Social Cost of Carbon. *Journal of the Association of Environmental and Resource Economists* 6(2): 243-273.

Anthoff D, C. Hepburn, and R. Tol. 2009. Equity Weighting and the Marginal Damage Costs of Climate Change. *Ecological Economics* 68:836-849.

Anthoff, D., and Tol, R.S.J. 2010. On International Equity Weights and National Decisions Making on Climate Change. *Journal of Environmental Economics and Management* 60(1): 14-20.

Anthoff, D. and Tol, R.S.J. 2013a. The uncertainty about the social cost of carbon: a decomposition analysis using FUND. *Climatic Change* 117: 515–530.

⁴⁷ The Executive Order also requests that the IWG assess the application of the SC-GHG to inform government decision making beyond regulations, in addition to recommending a robust long-term structure for ensuring the SC-GHGs continue to reflect the best available science and economic and that long-term research needs are met.

Anthoff, D. and Tol, R.S.J. 2013b. Erratum to: The uncertainty about the social cost of carbon: A decomposition analysis using FUND. *Climatic Change* 121(2): 413.

Anthoff, D., R. Tol, and G. Yohe. 2009. Risk aversion, time preference, and the social cost of carbon. *Environmental Research Letters* 4: 024002 (7pp).

Arrow, K., Cropper, M., Gollier, C., Groom, B., Heal, G., Newell, R., Nordhaus, W., Pindyck, R., Pizer, W., and Portney, P. 2013. Determining Benefits and Costs for Future Generations. *Science* 341(6144): 349-350

Arrow, K., Cropper, M., Gollier, C., Groom, B., Heal, G., Newell, R., Nordhaus, W., Pindyck, R., Pizer, W., and Portney, P. 2014. Should Governments Use a Declining Discount Rate in Project Analysis? *Review of Environmental Economics and Policy* 8(2): 145–163.

Auffhammer, M. 2018. Quantifying Economic Damages from Climate Change. *Journal of Economic Perspectives* 32(4): 33–52.

Bradford, D.F. 1975. Constraints on government investment opportunities and the choice of discount rate. *American Economic Review* 65(5): 887-899.

Bauer, M. and Rudebusch, G.D. 2020. The Rising Cost of Climate Change: Evidence from the Bond Market. Federal Reserve Bank of San Francisco Working Paper 2020-25. Available at: https://doi.org/10.24148/wp2020-25 (accessed February 5, 2021).

Carleton, T. and Greenstone, M. 2021. Updating the United States Government's Social Cost of Carbon. University of Chicago, Becker Friedman Institute for Economics Working Paper, (2021-04). Available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3764255 (accessed February 5, 2021).

Center for Biological Diversity v. National Highway Traffic Safety Administration, 538 F.3d 1172 (9th Cir.). Available at: https://casetext.com/case/center-for-biological-v-nhtsa (accessed February 5, 2021).

Center for Climate and Security, The. 2018. Military Expert Panel Report Sea Level Rise and the U.S. Military's Mission. Available at: https://climateandsecurity.files.wordpress.com/2018/02/military-expert-panel-report_sea-level-rise-and-the-us-militarys-mission_2nd-edition_02_2018.pdf (accessed February 5, 2021)

Clarke, L., Edmonds, J., Krey, V., Richels, R., Rose, S., and Tavoni, M. 2009. International climate policy architectures: Overview of the EMF 22 International Scenarios. *Energy Economics* 31: S64-S81.

Clarkson, R. and Deyes, K. 2002. Estimating the social cost of carbon emissions. London: HM Treasury.

Council of Economic Advisers (CEA). 2017. Discounting for public policy: Theory and recent evidence on the merits of updating the discount rate. Issue Brief. Executive Office of the President. Available at: https://obamawhitehouse.archives.gov/sites/default/files/page/files/201701_cea_discounting_issue_brief.pdf (accessed February 5, 2021).

Cropper, Maureen L., Mark C. Freeman, Ben Groom, and William A. Pizer. 2014. Declining Discount Rates. *American Economic Review*, 104 (5): 538-43.

Dreze, J.H. 1974. Investment under private ownership: optimality, equilibrium and stability. In *Allocation under uncertainty: equilibrium and optimality* (pp. 129-166). Palgrave Macmillan, London.

Department of Defense. 2014. Climate Change Adaptation Roadmap. Available at: https://www.acq.osd.mil/eie/downloads/CCARprint_wForward_e.pdf (accessed February 5, 2021).

Drupp, M., M. Freeman, B. Groom, and F. Nesje. 2018. Discounting Disentangled. *American Economic Journal: Economic Policy* 10 (4): 109-34.

Executive Order (E.O.) 12866. Regulatory Planning and Review, Section 1(a), October 4, 1993. Available at: https://www.archives.gov/files/federal-register/executive-orders/pdf/12866.pdf (accessed February 5, 2021).

Executive Order (E.O.) 13783. Promoting Energy Independence and Economic Growth March 28, 2017. Available at: https://www.federalregister.gov/documents/2017/03/31/2017-06576/promoting-energy-independence-and-economic-growth (accessed February 5, 2021).

Executive Order (E.O.) 13990. Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. January 20, 2021. Available at:

https://www.federalregister.gov/documents/2021/01/25/2021-01765/protecting-public-health-and-the-environment-and-restoring-science-to-tackle-the-climate-crisis (accessed February 5, 2021).

Fankhauser, S., Tol, R.S.J., and Pearce, D. 1997. The Aggregation of Climate Change Damages: A Welfare Theoretic Approach. *Environmental and Resource Economics* 10: 249-266.

Fann N.L., Nolte C.G., Sarofim M.C., Martinich J., Nassikas N.J. 2021. Associations between simulated future changes in climate, air quality, and human health. *JAMA Netw Open.* 4(1).

Fawcett, A., Calvin, K., de la Chesnaye, F., Reilly, J., and Weyant, J. 2009. Overview of EMF 22 U.S. transition scenarios. *Energy Economics* 31: S198-S211.

Gollier, C. 2009. Expected Net Present Value, Expected Net Future Value, and the Ramsey Rule. *Journal of Environmental Economics and Management*, 59(2): 142-148.

Gollier, C. 2014. Discounting and growth. American Economic Review, 104(5): 534-537.

Gollier, C. and Weitzman, M. 2010. How should the distant future be discounted when discount rates are uncertain? *Economics Letters*, 107(3): 350-353.

Goulder, L. 2007. Benefit-Cost Analysis, Individual Differences, and Third Parties. In *Research in Law and Economics, Vol. 23*. Zerbe, R.O. (Ed.) Emerald Group Publishing Limited, Bingley.

Greenstone, Michael. 2016 (May). A New Path Forward for an Empirical Social Cost of Carbon. Presented at The National Academies of Sciences, Engineering, and Medicine, *Assessing Approaches to Updating the Social Cost of Carbon*. Available at:

https://sites.nationalacademies.org/cs/groups/dbassesite/documents/webpage/dbasse_172599.pdf (Accessed February 5, 2021).

Groom, B., C. Hepburn, P. Koundouri, and D. Pearce. 2005. Declining Discount Rates: The Long and the Short of It. *Environmental and Resource Economics*, 32: 445-493.

Groom, B., P. Koundouri, E. Panopoulou, and T. Pantelidis. 2007. Discounting the Distant Future: How Much Does Model Selection Affect the Certainty Equivalent Rate? *Journal of Applied Econometrics*, 22(3): 641-656.

Harberger, A.C. 1972. On measuring the social opportunity cost of public funds. In *Project Evaluation* (pp. 94-122). Palgrave Macmillan, London.

Hänsel, M.C., Drupp, M.A., Johansson, D.J., Nesje, F., Azar, C., Freeman, M.C., Groom, B. and Sterner, T., 2020. Climate economics support for the UN climate targets. *Nature Climate Change*, 10(8), pp.781-789.

HM Treasury. 2020. The Green Book: Central Government Guidance on Appraisal and Evaluation. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/93 8046/The_Green_Book_2020.pdf

Hope C. 2006. The marginal impact of CO2 from PAGE2002: an integrated assessment model incorporating the IPCC's five reasons for concern. *The Integrated Assessment Journal* 6(1):19-56.

Hope, C. 2008. Discount Rates, Equity Weights and the Social Cost of Carbon. *Energy Economics*, 30(3): 1011-1019.

Hope C. 2008. Optimal carbon emissions and the social cost of carbon under uncertainty. *The Integrated Assessment Journal* 8(1):107-122.

Hope, C. 2013. Critical issues for the calculation of the social cost of CO₂: why the estimates from PAGE09 are higher than those from PAGE2002. *Climatic Change*, 117: 531–543.

Houser and Larson. 2021. Calculating the Climate Reciprocity Ratio for the US. Available at: https://rhg.com/research/climate-reciprocity-ratio (accessed February 5th, 2021).

Howard, P., and Schwartz, J. 2019. Think Global: International Reciprocity as Justification for a Global Social Cost of Carbon. *Columbia Journal of Environmental Law*, 42(S): 203-294.

Howard, P.H., Sylvan, D. 2020. Wisdom of the experts: Using survey responses to address positive and normative uncertainties in climate-economic models. *Climatic Change*, 162: 213–232.

Interagency Working Group on Social Cost of Carbon (IWG). 2010. Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis under Executive Order 12866. February. United States Government. Available at: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs.

Interagency Working Group on Social Cost of Carbon (IWG). 2013. Technical Support Document: Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866. May. United States Government. Available at: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs.

Interagency Working Group on Social Cost of Carbon (IWG). 2015. Response to Comments: Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866. July. United States Government. Available at: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs

Interagency Working Group on Social Cost of Greenhouse Gases (IWG). 2016a. Technical Support Document: Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866. August. United States Government. Available at: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs

Interagency Working Group on the Social Cost of Greenhouse Gases (IWG). 2016b. Addendum to Technical Support Document on Social Cost of Carbon for Regulatory Impact Analysis under Executive Order 12866: Application of the Methodology to Estimate the Social Cost of Methane and the Social Cost of Nitrous Oxide. August. United Stated Government. Available at: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs.

Intergovernmental Panel on Climate Change (IPCC). 2007. Core Writing Team; Pachauri, R.K; and Reisinger, A. (ed.), Climate Change 2007: Synthesis Report, Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, IPCC, ISBN 92-9169-122-4.

Intergovernmental Panel on Climate Change (IPCC). 2014. Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland, 151 pp.

Intergovernmental Panel on Climate Change (IPCC). 2018. Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)].

Intergovernmental Panel on Climate Change (IPCC). 2019a. Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems [P.R. Shukla, J. Skea, E. Calvo Buendia, V. Masson-Delmotte, H.-O. Pörtner, D. C. Roberts, P. Zhai, R. Slade, S. Connors, R. van Diemen, M. Ferrat, E. Haughey, S. Luz, S. Neogi, M. Pathak, J. Petzold, J. Portugal Pereira, P. Vyas, E. Huntley, K. Kissick, M. Belkacemi, J. Malley, (eds.)].

Intergovernmental Panel on Climate Change (IPCC). 2019b. IPCC Special Report on the Ocean and Cryosphere in a Changing Climate [H.-O. Pörtner, D.C. Roberts, V. Masson-Delmotte, P. Zhai, M. Tignor, E. Poloczanska, K. Mintenbeck, A. Alegría, M. Nicolai, A. Okem, J. Petzold, B. Rama, N.M. Weyer (eds.)].

Kopp, R., A. Krupnick, and M. Toman. 1997. *Cost-Benefit Analysis and Regulatory Reform: An Assessment of the Science and the Art*. Report to the Commission on Risk Assessment and Risk Management.

Kopp, R.E. and Mignone, B.K. 2013. Circumspection, reciprocity, and optimal carbon prices. *Climatic Change* 120(4): 831-843.

Kotchen, M. 2018. Which Social Cost of Carbon? A Theoretical Perspective. *Journal of the Association of Environmental and Resource Economists*, 5(3): 673-694.

Lebègue, Daniel. 2005. Révision du Taux d'Actualisation des Investissements Publics. Rapport du Groupe d'Experts, Commisariat Général du Plan.

Li, Q., and W.A. Pizer. 2021. Use of the consumption discount rate for public policy over the distant future. *Journal of Environmental Economics and Management* doi: https://doi.org/10.1016/j.jeem.2021.102428.

Marten, A.L., and S.C. Newbold. 2012. Estimating the social cost of non-CO₂ GHG emissions: methane and nitrous oxide. *Energy Policy*, 51: 957-972.

Marten, A.L., Kopits, E.A., Griffiths, C.W., Newbold, S.C., and A. Wolverton. 2015. Incremental CH_4 and N_2O Mitigation Benefits Consistent with the U.S. Government's $SC-CO_2$ Estimates. Climate Policy 15(2): 272-298.

Moore, Frances C., Uris Baldos, Thomas Hertel, and Delavane Diaz. 2017. New Science of Climate Change Impacts on Agriculture Implies Higher Social Cost of Carbon. *Nature Communications*, 8(1): 1-9.

Moss, R.H., J.A. Edmonds, K.A. Hibbard, M.R. Manning, S.K. Rose, D.P. Van Vuuren, T.R. Carter, S. Emori, M. Kainuma, T. Kram, G.A. Meehl, J.F.B. Mitchell, N. Nakicenovic, K. Riahi, S.J. Smith, R.J. Stouffer, A.M. Thomson, J.P. Weyant, and T.J. Wilbanks. 2010. The next generation of scenarios for climate change research and assessment. *Nature*, 463: 747-756.

Muller, U.K., J.H. Stock and M.W. Watson. 2020. An Econometric Model of International Growth Dynamics for Long-Horizon Forecasting. *The Review of Economics and Statistics* 0 0:ja, 1-47. https://doi.org/10.1162/rest a 00997.

National Academies of Sciences, Engineering, and Medicine (National Academies). 2016a. *Assessment of Approaches to Updating the Social Cost of Carbon: Phase 1 Report on a Near-Term Update*. Washington, D.C.: National Academies Press.

National Academies of Sciences, Engineering, and Medicine (National Academies). 2016b. *Attribution of Extreme Weather Events in the Context of Climate Change*. Washington, DC: The National Academies Press. https://dio.org/10.17226/21852.

National Academies of Sciences, Engineering, and Medicine (National Academies). 2017. *Valuing Climate Damages: Updating Estimation of the Social Cost of Carbon Dioxide*. Washington, D.C.: National Academies Press.

National Academies of Sciences, Engineering, and Medicine (National Academies). 2019. *Climate Change and Ecosystems*. Washington, DC: The National Academies Press. https://doi.org/10.17226/25504.

Neumann, James E., Jacqueline Willwerth, Jeremy Martinich, James McFarland, Marcus C. Sarofim, and Gary Yohe. 2020. Climate Damage Functions for Estimating the Economic Impacts of Climate Change in the United States. *Review of Environmental Economics and Policy*, 14(1): 5-43.

Newell, R., and Pizer, W. 2003. Discounting the distant future: how much do uncertain rates increase valuations? *Journal of Environmental Economics and Management*, 46: 52-71.

New York Department of Environmental Conservation. 2020. Establishing a Value of Carbon: Guidelines for Use by State Agencies. https://www.dec.ny.gov/docs/administration_pdf/vocfguid.pdf.

Nicholls, Z. R. J., Meinshausen, M., Lewis, J., Gieseke, R., Dommenget, D., Dorheim, K., Fan, C.-S., Fuglestvedt, J. S., Gasser, T., Golüke, U., Goodwin, P., Hartin, C., Hope, A. P., Kriegler, E., Leach, N. J., Marchegiani, D., McBride, L. A., Quilcaille, Y., Rogelj, J., Salawitch, R. J., Samset, B. H., Sandstad, M., Shiklomanov, A. N., Skeie, R. B., Smith, C. J., Smith, S., Tanaka, K., Tsutsui, J., and Xie, Z. 2020. Reduced Complexity Model Intercomparison Project Phase 1: introduction and evaluation of global-mean temperature response, Geosci. Model Dev., 13, 5175–5190, https://doi.org/10.5194/gmd-13-5175-2020.

Nordhaus W. 2008. A Question of Balance: Weighing the Options on Global Warming Policies. New Haven, CT: Yale University Press.

Nordhaus, W. 2010. Economic aspects of global warming in a post-Copenhagen environment. *Proceedings of the National Academy of Sciences*, 107(26): 11721-11726.

Nordhaus, W. 2014. Estimates of the Social Cost of Carbon: Concepts and Results from the DICE-2013R Model and Alternative Approaches. *Journal of the Association of Environmental and Resource Economists* 1(1/2): 273-312.

Nordhaus, W.D., 2017. Revisiting the social cost of carbon. *Proceedings of the National Academy of Sciences*, 114(7), pp.1518-1523.

Nordhaus, W. 2019a. Climate Change: The Ultimate Challenge for Economics. *American Economic Review* 109(6): 1991–2014.

Nordhaus, W. 2019b. Economics of the Disintegration of the Greenland Ice Sheet. *PNAS* 116(25): 12261–12269.

Nordhaus W., and Boyer J. 2000. Warming the World: Economic Models of Global Warming. Cambridge, MA: MIT Press.

Office of Management and Budget (OMB). 2003. Circular A-4, Regulatory Analysis, September 17. Available at: http://www.whitehouse.gov/omb/circulars_a004_a-4/ (accessed February 5, 2021).

Pindyck, R. 2017. Comments from Robert Pindyck, to BLM, on the Social Cost of Methane in the Proposed Suspension of the Waste Prevention Rule (submitted Nov. 6, 2017).

Pizer, W. 2019. Valuing the Greenland ice sheet and other complex geophysical phenomena. *PNAS* 116(25): 12134–12135.

Pizer, W., M. Adler, J. Aldy, D. Anthoff, M. Cropper, K. Gillingham, M. Greenstone, B. Murray, R. Newell, R. Richels, A. Rowell, S. Waldhoff, and J. Wiener. 2014. Using and Improving the Social Cost of Carbon. *Science* 346: 1181–82.

Revesz, R., Greenstone, M., Hanemann, M., Livermore, M., Sterner, T., Grab, D., Howard, P. and Schwartz, J. 2017. Best cost estimate of greenhouse gases. *Science*, 357(6352): 655.

Riahi, Keywan, Detlef P. van Vuuren, Elmar Kriegler, Jae Edmonds, Brian C. O'Neill, Shinichiro Fujimori, Nico Bauer, Katherine Calvin, Rob Dellink, Oliver Fricko, Wolfgang Lutz, Alexander Popp, Jesus Crespo Cuaresma, Samir KC, Marian Leimbach, Leiwen Jiang, Tom Kram, Shilpa Rao, Johannes Emmerling, Kristie Ebi, Tomoko Hasegawa, Petr Havlik, Florian Humpenöder, Lara Aleluia Da Silva, Steve Smith, Elke

Stehfest, Valentina Bosetti, Jiyong Eom, David Gernaat, Toshihiko Masui, Joeri Rogelj, Jessica Strefler, Laurent Drouet, Volker Krey, Gunnar Luderer, Mathijs Harmsen, Kiyoshi Takahashi, Lavinia Baumstark, Jonathan C. Doelman, Mikiko Kainuma, Zbigniew Klimont, Giacomo Marangoni, Hermann Lotze-Campen, Michael Obersteiner, Andrzej Tabeau, and Massimo Tavoni. 2017. The Shared Socioeconomic Pathways and their energy, land use, and greenhouse gas emissions implications: An overview. *Global Environmental Change*, 42: 153-168.

Rode, A., R. Baker, T. Carleton, A. D'Agostino, M. Delgado, T. Foreman, M. Greenstone, T. Houser, S. Hsiang, A. Hultgren, A. Jina, R. Kopp, K. McCusker, I. Nath, M. Pecenco, J. Rising, and J. Yuan. 2020. Labor Disutility in a Warmer World: The Impact of Climate Change on the Global Workforce.

Rode, A., T. Carleton, M. Delgado, M. Greenstone, T. Houser, S. Hsiang, A. Hultgren, A. Jina, R. Kopp, K. McCusker, I. Nath, J. Rising, and J. Yuan. 2021. Estimating a Social Cost of Carbon for Global Energy Consumption.

Roe, G.H. and Baker, M.B. 2007. Why is climate sensitivity so unpredictable? *Science* 318(5850): 629-632.

Sandmo, A. and Dreze, J.H. 1971. Discount rates for public investment in closed and open economies. *Economica* 38(152): 395-412.

Schwermer, S., 2012. Economic Valuation of Environmental Damage—Methodolocical Convention 2.0 for Estimates of Environmental Costs. German Federal Environment Agency (UBA): Berlin, Germany.

Smith, C. J., Forster, P. M., Allen, M., Leach, N., Millar, R. J., Passerello, G. A., and Regayre, L. A. 2018. FAIR v1.3: a simple emissions-based impulse response and carbon cycle model. *Geosci. Model Dev.*, 11: 2273-2297, https://doi.org/10.5194/gmd-11-2273-2018.

Stern, N., and J. Stiglitz. 2021. The Social Cost of Carbon, Risk, Distribution, Market Failures: An Alternative Approach. National Bureau of Economic Research Working Paper Series: No. 28472.

Summers, L. and Zeckhauser, R. 2008. Policymaking for posterity. *Journal of Risk and Uncertainty*, 37(2): 115-140.

Tol, R. 2002a. "Estimates of the damage costs of climate change. Part I: benchmark estimates." Environmental and Resource Economics 21:47-73.

Tol, R. 2002b. "Estimates of the damage costs of climate change. Part II: dynamic estimates." Environmental and Resource Economics 21:135-160.

Tol, R. 2009. "An analysis of mitigation as a response to climate change." Copenhagen Consensus on Climate. Discussion Paper.

U.S. Bureau of Economic Analysis (BEA). Implicit Price Deflators for Gross Domestic Product, Table 1.1.9. https://apps.bea.gov/iTable/index_nipa.cfm (accessed February 10, 2021).

U.S. Congressional Budget Office. 2020. Long Term Budget Outlook. September. https://www.cbo.gov/publication/56516.

U.S. EPA. 2010. Guidelines for Preparing Economic Analyses. EPA-240-R-10-001. Office of the Administrator. December.

- U.S. EPA. 2016. Technical Guidance for Assessing Environmental Justice in Regulatory Analysis. Available at: https://www.epa.gov/sites/production/files/2016-06/documents/ejtg-5-6-16-v5.1.pdf
- U.S. EPA Science Advisory Board. 2021. SAB Peer Review of the EPA's Revised Guidelines for Preparing Economic Analysis. January 6. Available at:

 $\frac{https://yosemite.epa.gov/sab/sabproduct.nsf/LookupWebProjectsCurrentBOARD/61C74C0E14BD59568}{52586550071E058/$File/EPA-SAB-21-002.pdf}\,.$

- U.S. Government Accountability Office (GAO). 2014. Regulatory Impact Analysis: Development of Social Cost of Carbon Estimates. GAO-14-663. July. Available at: https://www.gao.gov/products/GAO-14-663 (accessed February 5, 2021).
- U.S. Government Accountability Office (GAO). 2020. Social Cost of Carbon: Identifying a Federal Entity to Address the National Academies' Recommendations Could Strengthen Regulatory Analysis. GAO-20-254. Available at: https://www.gao.gov/assets/710/707776.pdf.
- U.S. Global Change Research Program (USGCRP). 2016. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. Crimmins, A., J. Balbus, J.L. Gamble, C.B. Beard, J.E. Bell, D. Dodgen, R.J. Eisen, N. Fann, M.D. Hawkins, S.C. Herring, L. Jantarasami, D.M. Mills, S. Saha, M.C. Sarofim, J. Trtanj, and L. Ziska, Eds. U.S. Global Change Research Program, Washington, DC, 312 pp. https://dx.dio.org/10.7930/J0R49NQX.
- U.S. Global Change Research Program (USGCRP). 2018. Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, 1515 pp. doi: 10.7930/NCA4.2018.

Weitzman, M.L. 1998. Why the Far-Distant Future Should Be Discounted at Its Lowest Possible Rate. *Journal of Environmental Economics and Management*, 36(3): 201-208.

Weitzman, M.L. 1999. Just keep discounting, but. In *Discounting and Intergenerational Equity,* Portney, P.R. and Weyant, J.P. (Ed.) Resources for the Future, New York.

Weitzman, M.L. 2001. Gamma Discounting. American Economic Review 91(1): 260-271.

Whittington and MacRae. 1986. The Issue of Standing in Cost-Benefit Analysis. *Journal of Policy Analysis and Management*, 5(4): 665-682.

Wong, T. E., Bakker, A. M. R., Ruckert, K., Applegate, P., Slangen, A. B. A., and Keller, K. 2017. BRICK v0.2, a simple, accessible, and transparent model framework for climate and regional sea-level projections. *Geosci. Model Dev.*, 10: 2741–2760, https://doi.org/10.5194/gmd-10-2741-2017.

Yumashev, D., Hope, C., Schaefer, K. et al. 2019. Climate policy implications of nonlinear decline of Arctic land permafrost and other cryosphere elements. *Nat Commun* 10, 1900.

Yumashev, D. 2020. PAGE-ICE Integrated Assessment Model. https://www.researchgate.net/publication/342396462_PAGE-ICE_Integrated_Assessment_Model.

Zero Zone, Inc. v. U.S. Dep't of Energy, 832 F.3d 654 (7th Cir. 2016). Available at: https://casetext.com/case/zero-zone-inc-v-us-dept-of-energy-1 (accessed February 5, 2021).

Appendix – Annual SC-CO₂, SC-CH₄, and SC-N₂O Values, 2020-2050

The values in Tables A-1 through A-3 are the same as those reported in the 2016 TSD and Addendum adjusted for inflation to 2020 dollars using the annual GDP Implicit Price Deflator values in U.S. Bureau of Economic Analysis (BEA) NIPA Table 1.1.9: 113.626 (2020)/ 92.486 (2007) = 1.228575 (U.S. BEA 2021). Values of SC-CO₂ presented in this TSD are rounded to the nearest dollar; SC-CH₄ and SC-N₂O are rounded to two significant figures. The annual unrounded estimates are available on OMB's website for use in regulatory and other analyses: https://www.whitehouse.gov/omb/information-regulatory-affairs/regulatory-matters/#scghgs.

Table A-1: Annual SC-CO₂, 2020 – 2050 (in 2020 dollars per metric ton of CO₂)

	Discount Rate and Statistic			
Emissions	5%	3%	2.5%	3%
Year	Average	Average	Average	95 th Percentile
2020	14	51	76	152
2021	15	52	78	155
2022	15	53	79	159
2023	16	54	80	162
2024	16	55	82	166
2025	17	56	83	169
2026	17	57	84	173
2027	18	59	86	176
2028	18	60	87	180
2029	19	61	88	183
2030	19	62	89	187
2031	20	63	91	191
2032	21	64	92	194
2033	21	65	94	198
2034	22	66	95	202
2035	22	67	96	206
2036	23	69	98	210
2037	23	70	99	213
2038	24	71	100	217
2039	25	72	102	221
2040	25	73	103	225
2041	26	74	104	228
2042	26	75	106	232
2043	27	77	107	235
2044	28	78	108	239
2045	28	79	110	242
2046	29	80	111	246
2047	30	81	112	249
2048	30	82	114	253
2049	31	84	115	256
2050	32	85	116	260

Table A-2: Annual SC-CH₄, 2020 – 2050 (in 2020 dollars per metric ton of CH₄)

	Discount Rate and Statistic			
Emissions	5%	3%	2.5%	3%
Year	Average	Average	Average	95 th Percentile
2020	670	1500	2000	3900
2021	690	1500	2000	4000
2022	720	1600	2100	4200
2023	750	1600	2100	4300
2024	770	1700	2200	4400
2025	800	1700	2200	4500
2026	830	1800	2300	4700
2027	860	1800	2300	4800
2028	880	1900	2400	4900
2029	910	1900	2500	5100
2030	940	2000	2500	5200
2031	970	2000	2600	5300
2032	1000	2100	2600	5500
2033	1000	2100	2700	5700
2034	1100	2200	2800	5800
2035	1100	2200	2800	6000
2036	1100	2300	2900	6100
2037	1200	2300	3000	6300
2038	1200	2400	3000	6400
2039	1200	2500	3100	6600
2040	1300	2500	3100	6700
2041	1300	2600	3200	6900
2042	1400	2600	3300	7000
2043	1400	2700	3300	7200
2044	1400	2700	3400	7300
2045	1500	2800	3500	7500
2046	1500	2800	3500	7600
2047	1500	2900	3600	7700
2048	1600	3000	3700	7900
2049	1600	3000	3700	8000
2050	1700	3100	3800	8200

Table A-3: Annual SC-N₂O, 2020 – 2050 (in 2020 dollars per metric ton of N₂O)

	Discount Rate and Statistic			
Emissions	5%	3%	2.5%	3%
Year	Average	Average	Average	95 th Percentile
2020	5800	18000	27000	48000
2021	6000	19000	28000	49000
2022	6200	19000	28000	51000
2023	6400	20000	29000	52000
2024	6600	20000	29000	53000
2025	6800	21000	30000	54000
2026	7000	21000	30000	56000
2027	7200	21000	31000	57000
2028	7400	22000	32000	58000
2029	7600	22000	32000	59000
2030	7800	23000	33000	60000
2031	8000	23000	33000	62000
2032	8300	24000	34000	63000
2033	8500	24000	35000	64000
2034	8800	25000	35000	66000
2035	9000	25000	36000	67000
2036	9300	26000	36000	68000
2037	9500	26000	37000	70000
2038	9800	27000	38000	71000
2039	10000	27000	38000	73000
2040	10000	28000	39000	74000
2041	11000	28000	39000	75000
2042	11000	29000	40000	77000
2043	11000	29000	41000	78000
2044	11000	30000	41000	80000
2045	12000	30000	42000	81000
2046	12000	31000	43000	82000
2047	12000	31000	43000	84000
2048	13000	32000	44000	85000
2049	13000	32000	45000	87000
2050	13000	33000	45000	88000

Public: (510) 879-1300 Telephone: (510) 879-1973 Facsimile: (510) 622-2270 E-Mail: Stacy.Lau@doj.ca.gov

OAKLAND, CA 94612-0550

Page

October 13, 2022

Hon. Pete Buttigieg Secretary U.S. Department of Transportation 1200 New Jersey Avenue S.E. Washington, DC 20590

Comments submitted electronically: https://www.regulations.gov

RE: **Comments on Notice of Proposed Rulemaking for the National Performance** Management Measures; Assessing Performance of the National Highway System, **Greenhouse Gas Emissions Measure**

Docket No. FHWA-2021-0004; RIN 2125-AF99

Dear Secretary Buttigieg:

Thank you for the opportunity to comment on the Federal Highway Administration of the U.S. Department of Transportation's ("FHWA") proposed rulemaking to institute a greenhouse gas performance measure for the national highway system, National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure, 87 Fed. Reg. 42,401 (July 15, 2022). This effort has the strong support of the Attorney General of California, Rob Bonta, ¹ as well as of the Attorneys General of the States of Colorado, Illinois, Maryland, Minnesota, New York, Oregon, Rhode Island, Washington, Wisconsin, Vermont, and the Commonwealth of Massachusetts, and of the District of Columbia.

The proposed rule (referred to in this letter as "the GHG Emissions Measure," "the measure," or "the proposal") would require States and metropolitan planning organizations ("MPOs") to measure and report information on greenhouse gas ("GHG") emissions from onroad mobile sources, and establish declining targets for such emissions on the Interstate and non-Interstate National Highway Systems (collectively, "NHS") within their state or planning area

¹ The California Attorney General submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State. See Cal. Const. art. V, § 13; Cal. Gov't Code, §§ 12511, 12600-12612; D'Amico v. Bd. Of Medical Examiners, 11 Cal. 3d 1, 14-15 (1974).

geographic boundaries. If finalized, the proposal will allow States and MPOs, many of which are already measuring and reporting such data, to contribute consistent and timely information about on-road mobile source emissions on the NHS, which will help inform transportation investments and planning choices.

Our comments demonstrate that (1) there is a continuing need for a national GHG emissions performance measure to inform transportation investments and planning decisions; (2) FHWA has the legal authority to establish the GHG Emissions Measure; and (3) the measure is a necessary continuation of efforts that FHWA, along with many States and MPOs, has undertaken to address the environmental performance of the NHS. The GHG Emissions Measure is thus a timely and important step toward fulfilling the statutory goal under 23 U.S.C. § 150(b)(6) of ensuring that the NHS is environmentally sustainable.

Background of States' Involvement and Support for the GHG Measure

The enactment of the 2012 Moving Ahead for Progress in the 21st Century Act, Pub. L. 112-141 ("MAP-21"), and the 2015 Fixing America's Surface Transportation ("FAST") Act, Pub. L. 114-94, required FHWA to establish "performance" measures that the States can use to assess performance of the Interstate and non-Interstate NHS. 87 Fed. Reg. at 42,404; 23 U.S.C. §§ 119(a), 150(c)(3)(A)(ii)(IV)–(V). The purpose of these performance measures is to refocus transportation investment on "national transportation goals" and improve project decisionmaking. 23 U.S.C. § 150(a). Significantly, one of these national goals is "environmental sustainability," which is achieved by "enhanc[ing] the performance of the transportation system while protecting and enhancing the natural environment." *Id.* § 150(b)(6).

In early 2017, citing the goal of environmental sustainability under 23 U.S.C. § 150(b)(6), FHWA adopted a measure similar to the GHG Emissions Measure now proposed, requiring State departments of transportation ("State DOTs") and MPOs to collect data and establish performance targets for GHG emissions on the NHS. National Performance Management Measures, 82 Fed. Reg. 5970 (Jan. 18, 2017). After a change in administrations, however, FHWA delayed implementation of the 2017 GHG Measure multiple times. 82 Fed. Reg. 10,441 (Feb. 13, 2017); 82 Fed. Reg. 14,438 (Mar. 21, 2017). The Attorney General of California, leading a state government coalition, filed suit in the Northern District of California in September 2017 to challenge FHWA's illegal delays.² Within days of the lawsuit's filing, FHWA announced that it would place the 2017 GHG measure into immediate effect, pending its

² In addition to the Attorney General of California, the multistate plaintiffs included the California Air Resources Board and the Attorneys General of Iowa, Maryland, Oregon, Vermont, Washington, and of the Commonwealth of Massachusetts, as well as the State of Minnesota by and through its department of transportation. *People of the State of California et al. v. FHWA*, No. 4:17-cv-05439 (N.D. Cal. filed Sept. 20, 2017).

formal repeal. 82 Fed. Reg. 46,427 (Oct. 5, 2017). The state coalition opposed the repeal.³ FHWA nevertheless arbitrarily and capriciously repealed the 2017 GHG Measure in July 2018. 83 Fed. Reg. 24,920 (May 31, 2018) (final rule).

The undersigned Attorneys General welcome FHWA's renewed efforts to promulgate this GHG Emissions Measure. The measure would amend FHWA's regulations to require State DOTs and MPOs to: (1) set declining targets for CO₂ tailpipe emissions on the NHS, consistent with national GHG emissions reduction goals; (2) track and report their performance in meeting these targets; and (3) document the actions they will take in achieving their targets if "significant progress" is not made. 87 Fed. Reg. at 42,402, 42,421. To calculate GHG emissions on the NHS, State DOTs would use existing information or data that State DOTs are already required to collect, together with a formula for determining corresponding CO₂ tailpipe emissions provided by FHWA. 87 Fed. Reg. at 42,415, 42,416.

The GHG Emissions Measure also provides State DOTs and MPOs with flexibility to set declining CO₂ emissions targets that work for their respective policy priorities,⁴ so long as such targets align with national GHG emissions reduction targets; but the measure does not set forth any specific penalty for failing to meet the targets set. 87 Fed. Reg. at 42,415, n.39. Notably, "significant progress" towards the declining targets is defined as either (1) the actual condition or performance level being better than the baseline condition or performance; or (2) the actual condition or performance level being equal to or better than the established target. 23 C.F.R. § 490.109(e)(1), (e)(2). Thus, under the GHG Emissions Measure as proposed, State DOTs and MPOs are considered to have made "significant progress" towards their targets so long as they have established declining GHG emissions in comparison to the baseline. Overall, the GHG Emissions Measure is an efficient and judicious tool for tracking and addressing GHG emissions on the NHS, allowing State DOTs and MPOs flexibility while aimed at ensuring investment and planning for the NHS align with the statutory goal of environmental sustainability.

GHG Emissions From Transportation Contribute Significantly to Climate Change, Which, In Turn, Threatens the Safety and Reliability of the NHS.

It is well-accepted within the scientific community that the anthropogenic addition of GHGs into the atmosphere, particularly from the burning of fossil fuels, is causing catastrophic climate change. The U.S. Global Change Research Program's Fourth National Climate

³ The Attorneys General for the States of California, Maryland, Washington, Oregon, Vermont, and the Commonwealth of Massachusetts submitted comments on November 6, 2017 opposing the repeal.

⁴ For example, a State DOT might choose to set targets resulting in steady, incremental progress toward net-zero emissions, targets leading to greater GHG emissions reductions in the near term, or targets that are more gradual at first. 87 Fed. Reg. 42,401, 42,412.

⁵ National Research Council 2020, *Climate Change: Evidence and Causes: Update 2020*, at 5, https://doi.org/10.17226/25733.

Assessment finds that "the evidence consistently points to human activities, especially emissions of greenhouse or heat-trapping gases, as the dominant cause" of climate change. GHG emissions continue to increase decade by decade, and are now more abundant in the earth's atmosphere than at any time in the last 800,000 years. Transportation is the top contributor to U.S. GHG emissions: it accounts for approximately 27% of all GHG emissions in the country. In California, transportation accounts for an even greater percentage—the transportation sector is responsible for 40% of all GHG emissions in the state. The transportation sectors in Vermont and Massachusetts account for similar percentages of statewide GHG emissions.

In turn, extreme weather events caused by climate change, including heat waves, intense storms, and wildfires, can have devastating effects on the condition of the NHS. 11 As FHWA recognized in FHWA Order 5520 (Dec. 15, 2014), "Climate change and extreme weather events present significant and growing risks to the safety, reliability, effectiveness, and sustainability of the Nation's transportation infrastructure and operations." 12 Higher temperatures can cause

⁶ U.S. Global Change Research Program, Fourth National Climate Assessment: Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II: Impacts, Risks, and Adaptation in the United States (Reidmiller, et al. (eds.)), at 73. 1515 pp. doi: 10.7930/NCA4.2018, https://nca2018.globalchange.gov/downloads/.

⁷ National Research Council, *Climate Change: Evidence and Causes: Update 2020*, at 6 (2020), https://doi.org/10.17226/25733. Alarmingly, global fossil CO₂ emissions are projected to increase by 4.8%, and U.S. fossil CO₂ emissions by 6.8%, in 2021. P. Friedlingstein et al., *Global Carbon Budget 2021*, Earth Syst. Sci. Data, 1917, 1934-35 (2022), https://doi.org/10.5194/essd-14-1917-2022.

⁸ Jacobs, et al., Fourth National Climate Assessment, Vol. II, Ch. 12, Transportation, in Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, (Reidmiller, et al. (eds.)), at 481. doi: 10.7930/NCA4.2018.CH12, https://nca2018.globalchange.gov/chapter/transportation; Environmental Protection Agency ("EPA"), Sources of Greenhouse Gas Emissions, https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions.

⁹ California Air Resources Board, Draft 2022 Scoping Plan Update, at 34, Figure 1-8 (May 10, 2022), https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan.

¹⁰ See State of Vermont Agency of Transportation, *Climate Change*, https://vtrans.vermont.gov/planning/climate-change; Massachusetts Clean Energy and Climate Plan for 2025 and 2030, June 30, 2022, at 30, https://www.mass.gov/doc/clean-energy-and-climate-plan-for-2025-and-2030/download.

¹¹ EPA, *Climate Impacts on Transportation*, https://19january2017snapshot.epa.gov/climate-impacts/climate-impacts-transportation .html.

¹² FHWA, *Order: Transportation System Preparedness and Resilience to Climate Change and Extreme Weather Events*, https://www.fhwa.dot.gov/legsregs/directives/orders/5520.cfm.

pavement to soften and expand, which can create rutting and potholes, and stress on bridge joints. Hurricanes—such as the recent and particularly disastrous Hurricane Ian—heavy storms, and snowfall can also cause damage necessitating greater maintenance, repairs, and rebuilding. Nationally, the total annual costs arising from temperature and precipitation related damage to paved roads is expected to approach \$20 billion in 2090; inland flooding, which threatens thousands of bridges across the country, is anticipated to result in average annual costs of \$1.2 billion to \$1.4 billion by 2050. 15

As the proposal notes, addressing the causes and the impacts of climate change will require efforts from all levels of government. 87 Fed. Reg. at 42,406. Regarding actions that State DOTs and MPOs can undertake within the transportation sector, a study from the Georgetown Climate Center demonstrates that an emphasis on maintenance of existing roadways, along with investments in transit and charging infrastructure, has the potential to accelerate reductions in GHG emissions by comparison with highway expansion. ¹⁶ Other actions that may reduce GHG emissions include improving system efficiency, encouraging a shift away from single-occupant vehicles, and other measures that reduce on-road travel demand. 87 Fed. Reg. at 42,411. Such actions will depend in large part on planning and investment decisions being made by State DOTs and MPOs. *Id*. ¹⁷ Considering the above, it is both prudent and necessary for FHWA to collect consistent, comprehensive data on GHG emissions on the NHS, both to evaluate the data in relation to the GHG emissions reduction targets set by State DOTs and MPOs, and to provide transparency with respect to Federal, State, and local transportation planning and investment decisions.

¹³ EPA, *Climate Impacts on Transportation*, https://19january2017snapshot.epa.gov/climate-impacts/climate-impacts-transportation_.html.

¹⁴ *Id*.

¹⁵ Jacobs, et al., Fourth National Climate Assessment, Vol. II, Ch. 12, Transportation, in Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, (Reidmiller, et al. (eds.)), at 485. doi: 10.7930/NCA4.2018.CH12, https://nca2018.globalchange.gov/downloads/NCA4 Ch12 Transportation Full.pdf.

¹⁶ Georgetown Climate Center, *Issue Brief: Estimating the Greenhouse Gas Impact of Federal Infrastructure Investments in the IIJA* (Dec. 16, 2021), https://www.georgetownclimate.org/articles/federal-infrastructure-investment-analysis.html.

¹⁷ See also Transportation Research Board, Practitioners Guide to Incorporating Greenhouse Gas Emissions Into the Collaborative Decision-Making Process, https://nap.nationalacademies.org/catalog/22802/practioners-guide-to-incorporating-greenhouse-gas-emissions-into-the-collaborative-decisionmaking-process (discussing the incorporation of GHG reduction strategies into transportation project planning).

FHWA Has Legal Authority to Enact the GHG Emissions Measure.

As previously expressed in the July 2017 State Attorneys General comment letter, FHWA has the legal authority to implement the GHG Emissions Measure. Under MAP-21, FHWA is required to establish "performance" measures to assess performance of the Interstate and non-Interstate NHS. 23 U.S.C. § 150(c)(3)(A)(ii)(IV)-(V). FHWA has correctly interpreted "performance" to include environmental performance. 87 Fed. Reg. at 42,402. Importantly, MAP-21 does not limit the meaning of "performance" under Section 150(c)(3)(A)(ii)(IV)-(V). And FHWA's interpretation of "performance" to include environmental performance is consistent with the express goals of the Federal-aid highway program, which include environmental sustainability. 23 U.S.C. § 150(b)(6).

FHWA's interpretation of "performance" is also consistent with the many other statutory provisions in Title 23 that make the environment an important part of the Federal-aid highway program, including Section 119(e), which, in furtherance of the NHPP, requires states to develop a "performance-driven" asset management plan that would support "progress toward the achievement of the national goals identified in section 150(b)." 23 U.S.C. § 119(e); see also id. § 101(b)(3)(G) (Congressional declaration that "transportation should play a significant role in...improving the environment"); id. §§109(c), (g), (h), (i), and (j) (requiring highway design to take into account environmental impacts and calling for FHWA to issue guidelines and standards for minimizing environmental effects of highway projects); id. § 134(a)(1) (stating national interest in "minimizing transportation-related fuel consumption and air pollution"); § 135(d)(1)(E) (requiring statewide transportation planning to "protect and enhance the environment").

Opponents of the measure are wrong to claim that Section 150(c) limits FHWA to establishing only those performance measures specifically set forth in paragraphs (3)(A)(ii)(I)-(III), (c)(4), and (c)(5) (e.g., performance measures for injuries, fatalities, pavement and bridge condition, congestion, on-road mobile source emissions, and freight movement). That reading fails to give meaning to paragraphs 150(c)(3)(A)(ii)(IV)-(V), which calls for FHWA to implement measures for the "performance" of the Interstate and National Highway Systems, without imposing limitations on the types of performance to be measured. Indeed, limiting FHWA only to these specifically delineated performance measures would render 23 U.S.C. § 150(c)(3)(A)(ii)(IV)-(V) redundant. See Ysleta Del Sur Pueblo v. Texas, 142 S.Ct. 1929, 1939 (2022) (effect must be given to all provisions of Section 107 of the Restoration Act, "so that no part will be inoperative or superfluous, void or insignificant"), citing Corley v. United States, 556 U.S. 303, 314 (2009). Instead, FHWA has appropriately interpreted the undefined term "performance" in accordance with the national goals expressly set forth by MAP-21.

The GHG Emissions Measure is a Necessary Continuation of FHWA's and the State DOTs' Existing Efforts to Address Environmental Sustainability on the NHS.

Consistent with its interpretation of "performance" to include environmental performance, FHWA has demonstrated through its long-standing policies and practice that

environmental sustainability is an important aspect of NHS performance. In 2013, for example, FHWA published guidance to State DOTs and MPOs on measuring GHG emissions from onroad vehicles and integrating GHG performance measures into investment and planning decisions.¹⁸

Further, as stated in an initial comment in support of the GHG Emissions Measure, many state departments of transportation are already fulfilling the proposed requirements in this measure. ¹⁹ For example:

- The Minnesota Department of Transportation has adopted GHG emission reduction targets for the transportation sector, and is reporting GHG emission estimates and targets on the NHS to FHWA on a bi-annual basis.
- The State of Oregon has set GHG reduction goals and provides monitoring reports for GHG emissions across all sectors, including transportation.²⁰
- Since the Global Warming Solutions Act of 2006 Assembly Bill (AB) 32²¹ became state law in California, the California Air Resources Board has developed a Scoping Plan,²² which lays out California's strategy for meeting its climate goals through reduced GHG emissions. AB 32 was followed by several other key bills and policies for California to address climate change, including but not limited to Senate Bill (SB) 375,²³ which requires CARB to set regional GHG reduction targets that metropolitan

¹⁸ USDOT / FHWA, A Performance-Based Approach to Addressing Greenhouse Gas Emissions through Transportation Planning, Publication No.: FHWA-HEP-14-020; see also FHWA 2013 Conditions and Performance Report (PDF version), "Advancing Environmental Sustainability" at 5-6 to 5-7, https://www.fhwa.dot.gov/policy/2013cpr/pdfs.cfm (discussing performance of the highway system in relation to sustainability, and referencing FHWA strategies and research regarding reduction of GHG emissions).

¹⁹ Comment letter dated July 18, 2022, from the Minnesota, Colorado, Pennsylvania, Connecticut, Oregon, California, Vermont, Hawaii, Washington State, Illinois, and District of Columbia Departments of Transportation.

²⁰ See Oregon Department of Environmental Quality, Oregon Greenhouse Gas Sector-Based Inventory Data, https://www.oregon.gov/deq/ghgp/Pages/GHG-Inventory.aspx (explaining that data is "compiled by integrating data from DEQ's Greenhouse Gas Reporting Program and modeled emissions estimates from EPA's State Inventory Tool).

²¹ 2006 Cal. Legis. Serv. Ch. 488 (AB 32) (West) (codified as amended at Cal Health & Safety Code § 38500-599), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB32

²² For more information visit: California Air Resources Board, *AB 32 Climate Change Scoping Plan*, https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan.

²³ 2008 Cal. Legis. Serv. Ch. 728 (SB 375, (West),

planning organizations must show in a Sustainable Communities Strategy that the region can meet through integrated land use and transportation planning that reduces vehicle miles traveled.

- The Washington State Department of Transportation established a performance measure for GHG on the NHS, and is reporting GHG emissions estimates and targets on the NHS to FHWA bi-annually.
- The Vermont Agency of Transportation has undertaken GHG research projects and recently issued a scope of work for a methodology to estimate the effect of its programs on GHG emissions and track and report progress toward achieving the State's GHG reduction goals.²⁴
- The Massachusetts Department of Transportation and MPOs evaluate and report the aggregate transportation GHG emissions impacts of Statewide Transportation Improvement Programs and Regional Transportation Plans, respectively, in order to assess progress toward meeting required GHG emissions reductions for the state's transportation sector.²⁵
- Since 2006, the District of Columbia has been tracking GHG emissions. It has made the commitment to achieve carbon neutrality by 2050, through a series of planning and legislative efforts. The District's DOT ("DDOT") has adopted several vehicle electrification strategies in its 2021 update of the statewide long-range transportation plan, moveDC. In addition, the District has been collaborating with its MPO, the National Capital Region Transportation Planning Board, on the recently adopted onroad transportation GHG goals of 50% below 2005 levels by 2030 and 80% below by 2050.²⁷

Because the GHG Emissions Measure only applies to the NHS and calls for State DOTs to use information that they are already required to report, and because the estimated total cost of the measure is limited—\$11 million to \$12.9 million over 10 years, 87 Fed. Reg. at 42,417—the

²⁴ See, e.g., State of Vermont Agency of Transportation, 22-4 Smartgrowth, VMT and GHG, https://vtrans.vermont.gov/planning/research/projects/22-4.

²⁵ See 310 Mass. Code Regs. 60.05, see also Massachusetts Office of Transportation Planning Sustainable Transportation, Greenhouse Gas Assessment and Reporting Guidance—Guidelines to Assist Metropolitan Planning Organizations in Complying with 310 CMR 60.05: Global Warming Solutions Act Requirements for Transportation, January 2020, https://www.mass.gov/doc/transportation-improvement-program-greenhouse-gas-assessment-and-reporting-guidance-document-0/download.

²⁶ moveDC, *The District of Columbia's Multimodal Long-Range Transportation Plan* (December 2021), https://movedc-dcgis/hub.arcgis.com.

²⁷ Nathaniel Cline, *D.C. Region Leaders Want to Halve Transportation Emissions by 2030 Despite Road Widening Plans*, Virginia Mercury, August 24, 2022, https://www.virginiamercury.com/2022/08/24/d-c-region-leaders-want-to-halve-road-emissions-by-2030-even-as-road-widening-plans-continue/.

measure represents a limited, straightforward, and cost-effective tool that will result in minimal additional staff time or expense from State DOTs and MPOs. ²⁸

Conclusion

As the proposed rulemaking notes, the GHG Emissions Measure would build on existing efforts by FHWA, State DOTs, and MPOs to track CO₂ emissions from on-road mobile sources, and would provide a consistent set of data to inform highway investment and planning decisions. 87 Fed. Reg. at 42,407. The measure is consistent with, and will help advance, the Federal-aid highway program's national goal for environmental sustainability under MAP-21, 23 U.S.C. § 150(b)(6). For the above reasons, the undersigned Attorneys General strongly support the GHG Emissions Measure.

Sincerely,

FOR THE STATE OF CALIFORNIA

STACY LAU

Deputy Attorney General
California Department of Justice
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1973

Facsimile: (510) 622-2270 E-mail: Stacy.Lau@doj.ca.gov

²⁸ Moreover, as detailed above, many states already have been tracking GHG emissions statewide and across sectors. State DOTs and MPOs can and should coordinate with other state agencies on data collection and reporting to ensure state agencies and MPOs are performing these efforts in an efficient and consistent manner.

STATE OF COLORADO

/s/ Scott Steinbrecher

SCOTT STEINBRECHER
Assistant Deputy Attorney General
Natural Resources & Environment Section
Colorado Office of the Attorney General
1300 Broadway, 7th Floor
Denver, CO 80203

Office: (720) 508 6287

Email: scott.steinbrecher@coag.gov

FOR THE STATE OF ILLINOIS

KWAME RAOUL ATTORNEY GENERAL

/s/ Jason E. James
JASON E. JAMES
Assistant Attorney General
Office of the Attorney General
201 West Pointe Drive, Suite 7
Belleville, IL 62226
Tel: (872) 276-3583

Email: jason.james@ilag.gov

FOR THE STATE OF MARYLAND

BRIAN E. FROSH ATTORNEY GENERAL

/s/ Steven J. Goldstein

STEVEN J. GOLDSTEIN Special Assistant Attorney General Office of the Attorney General 200 Saint Paul Place, 20th Floor Baltimore, MD 21202

Tel: (410) 576-6414

Email: sgoldstein@oag.state.md.us

FOR THE STATE OF MINNESOTA

KEITH ELLISON ATTORNEY GENERAL

/s/ Joseph T. Heegaard
Special Assistant Attorney General
Minnesota Attorney General's Office
445 Minnesota Street, Suite 1400
St. Paul, MN 55101
Tel: (651) 583-6667
joseph.heegaard@ag.state.mn.us

FOR THE STATE OF NEW YORK

LETITIA JAMES Attorney General

/s/ Joshua Tallent
JOSHUA TALLENT
Assistant Attorney General
New York State Office of the Attorney General
Environmental Protection Bureau
The Capitol
Albany, NY 12224
(518) 776-2456
joshua.tallent@ag.ny.gov

FOR THE STATE OF OREGON

ELLEN F. ROSENBLUM ATTORNEY GENERAL

/s/ Paul Garrahan

Paul Garrahan
Attorney-in-Charge
Steve Novick
Special Assistant Attorney General
Natural Resources Section
Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
Tel: (503) 947-4540
Paul.Garrahan@doj.state.or.us
Steve.Novick@doj.state.or.us

FOR THE STATE OF RHODE ISLAND

PETER F. NERONHA Attorney General of Rhode Island

By: /s/ Randelle L. Boots
RANDELLE L. BOOTS
Special Assistant Attorney General
Rhode Island Office of the Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400 ext. 2122

FOR THE STATE OF WASHINGTON

ROBERT W. FERGUSON ATTORNEY GENERAL

/s/ Christopher H. Reitz CHRISTOPHER H. REITZ Assistant Attorney General Office of the Attorney General P.O. Box 40117 Olympia, Washington 98504-0117 Tel: (360) 586-4614 Email: chris.reitz@atg.wa.gov

FOR THE STATE OF WISCONSIN

Joshua L. Kaul Wisconsin Attorney General

/s/ Zachary B. Corrigan
Zachary B. Corrigan
Special Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
Tel: (608) 266-1677 (Corrigan)
Facsimile: (608) 294-2907 (Fax)
Email: CorriganZB@doj.state.wi.us

STATE OF VERMONT

SUSANNE R. YOUNG Attorney General

/s/ Nicholas F. Persampieri
Nicholas F. Persampieri
Assistant Attorney General
Office of the Attorney General
109 State Street
Montpelier, VT 05609
Tel: (802) 828-6902

Email: nick.persampieri@vermont.gov

FOR THE COMMONWEALTH OF MASSACHUSETTS

/s/ Matthew Ireland

MATTHEW IRELAND
Assistant Attorney General
Environmental Protection Division
Office of the Attorney General
One Ashburton Place, 18th Floor
Boston, MA 02108
Tel: (617) 963-2434

Email: matthew.ireland@mass.gov

FOR THE DISTRICT OF COLUMBIA

KARL RACINE ATTORNEY GENERAL OF THE DISTRICT OF COLUMBIA

By: /s/ Lauren Cullum
LAUREN CULLUM*
Special Assistant Attorney General
Office of the Attorney General for the
District of Columbia
400 6th St. NW
Washington, DC 20001
Tel: (202) 727-3400
lauren.cullum@dc.gov
*Admitted to practice in the State of
Louisiana. Practicing in the District of
Columbia under the direct supervision of
Jennifer L. Berger, a member of the D.C.
Bar, pursuant to D.C. Court of Appeals
Rule 49(c).

SJL:

OK2022303639 2022-1013 [FINAL] FHWA GHG Emissions Measure Letter.docx



Commonwealth of Kentucky Office of the Attorney General

Daniel Cameron Attorney General Capitol Bldg., Suite 118 700 Capital Avenue Frankfort, KY 40601 (502) 696-5300 Fax: (502) 564-2894

October 13, 2022

Via Federal eRulemaking Portal Federal Highway Administration U.S. Department of Transportation 1200 New Jersey Avenue SE Washington, DC 20590

Re: National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure (Docket ID No. FHWA-2021-0004)

On behalf of the Attorneys General for the Commonwealth of Kentucky and the States of Alabama, Alaska, Arkansas, Florida, Georgia, Indiana, Kansas, Louisiana, Mississippi, Montana, Nebraska, Oklahoma, South Carolina, South Dakota, Texas, Utah, Virginia, West Virginia, and Wyoming, we respectfully submit the following comments in response to the Federal Highway Administration's ("FHWA" or "Agency") proposed rule establishing a Greenhouse Gas ("GHG") Emissions Measure.¹

I. Introduction

Through this proposed rule, which FHWA refers to as the "proposed GHG measure," FHWA intends to require all States that have National Highway System mileage within their geographic boundaries—which includes all fifty States, the District of Columbia, and Puerto Rico²—to set targets to reduce tailpipe CO₂

_

¹ National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure, 87 Fed. Reg. 135 (proposed Jul. 15, 2022), available at https://www.govinfo.gov/content/pkg/FR-2022-07-15/pdf/2022-14679.pdf [hereinafter "Proposed GHG Measure"].

² Id. at 42402; see U.S. Department of Transportation Federal Highway Administration (Oct. 1, 2020), https://www.fhwa.dot.gov/planning/national_highway_system/nhs.pdf.

emissions down to "net-zero" by 2050.³ The States would be required to report their progress in meeting the targets in biennial reports.

This wide-sweeping rule, which is similar to an earlier since-repealed rule, is being revived not because Congress has provided clarity on the issues the Agency flagged in 2018 when it repealed the rule,⁴ but because the Department of Transportation considers it "essential" to achieving the "Administration's target of net-zero emissions, economy-wide, by 2050"⁵ and believes it "would help the United States confront the increasingly urgent climate crisis."⁶ But Congress has not given FHWA authority to regulate in this way. And even if it had, the States cannot be compelled to administer federal regulatory programs and certainly cannot be mandated to further Executive policy wishes. FHWA should rescind this proposed rule.

II. Background

This is not FHWA's first attempt at imposing such a measure. The 2012 Moving Ahead for Progress in the 21st Century Act required State Departments of Transportation ("DOT") and metropolitan planning organizations ("MPO") to report their "progress in achieving performance targets" set by the State to address certain assessment measures established by FHWA, including "on-road mobile source emissions." 23 U.S.C. § 150. Relying on that requirement, FHWA issued a rule in 2017 requiring States to make percentage reductions of on-road CO₂ emissions.⁷

One year later, the Agency repealed the measure.⁸ FHWA identified the measure as being "potentially duplicative of existing efforts in some States" and believed it imposed "unnecessary burdens on State DOTs and MPOs that were not contemplated by Congress." Further, it found interpreting the term "performance" as including "environmental performance" to be "a strained reading of the statutory

³ Proposed GHG Measure, *supra* note 1, at 42402.

⁴ National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program, 83 Fed. Reg. 105 at 24922 (May. 31, 2018), available at https://www.govinfo.gov/content/pkg/FR-2018-05-31/pdf/2018-11652.pdf [hereinafter "2018 Repeal"].

⁵ Proposed GHG Measure, *supra* note 1, at 42402–42403.

⁶ Id. at 42402.

National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program, 82 Fed. Reg. 11 at 6002 (Jan. 18, 2017), available at https://www.govinfo.gov/content/pkg/FR-2017-01-18/pdf/2017-00681.pdf.

^{8 2018} Repeal, *supra* note 4.

⁹ *Id.* at 24922.

¹⁰ Id. A group of U.S. Senators have asserted that the proposed GHG measure similarly is "overly burdensome on state DOTs and MPOs." Letter in Response to FHWA Proposed Rule, (July 28, 2022), available at https://www.regulations.gov/comment/FHWA-2021-0004-0007 [hereinafter "Republican Senator Comment"].

language in section 150, and one that did not fully consider the limitations imposed by the statute itself and by other relevant considerations."¹¹

Now, FHWA proposes to once again impose a GHG measure on the States because it believes "the repeal conflicts with th[e] objectives" set out in the President's Executive Orders relating to climate change. And this time, the proposed GHG measure delineates targets the States must meet, requiring States to reduce CO₂ emissions to meet the Administration's economy-wide goal of having net-zero emissions by 2050. The below-signed Attorneys General believe that, while the proposed GHG measure may be aligned with the Biden Administration's climate change priorities, it is seriously out-of-step with FHWA's statutory and constitutional authority.

III. Analysis

A. Neither prior existing law nor the new Infrastructure Investment and Jobs Act authorize FHWA to impose the proposed GHG measure.

According to President Biden, there is a "climate crisis," and FHWA proposes the GHG measure as a means to address it. ¹⁴ But "[a]gencies have only those powers given to them by Congress, and enabling legislation is generally not an open book to which the agency may add pages and change the plot line." *West Virginia v. EPA*, 142 S. Ct. 2587, 2609 (2022) (cleaned up). The proposed GHG measure would be a serious revision of what Congress has written, and Congress has not given FHWA such editorial power.

FHWA asserts that because "23 U.S.C. [§] 150(c) directs FHWA to establish performance measures that the State DOTs can use to assess performance of the Interstate and non-Interstate [National Highway System]," the agency has authority to require State DOTs to establish targets to reduce CO₂ emissions "that align with the Administration's target of net-zero emissions." It also asserts that it is "implementing Congress's express direction regarding [National Highway Performance Program] goals" in light of the Infrastructure Investment and Jobs Act ("IIJA"), which amended one of the purposes of the National Highway Performance Program to include providing "support for activities to increase the resiliency of the

¹¹ 2018 Repeal, *supra* note 4, at 24923.

¹² Proposed GHG Measure, *supra* note 1, at 42403.

¹³ *Id.* at 42402.

See id. at 42401, 42406–42407 (citing several Executive Orders, including Exec. Order No. 13990, "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis," and Exec. Order No. 14008, "Tackling the Climate Crisis at Home and Abroad").

¹⁵ *Id.* at 42402.

National Highway System to mitigate the cost of damages from sea level rise, extreme weather events, flooding, wildfires, or other natural disasters." ¹⁶

But when interpreting a statute "that confers authority upon an administrative agency, th[e] inquiry must be 'shaped, at least in some measure, by . .' whether Congress in fact meant to confer the power the agency has asserted." West Virginia v. EPA, 142 S. Ct. at 2607–08 (quoting FDA v. Brown & Williamson Tobacco Corp., 529 U.S. 120, 159 (2000)). Here, it is clear that Congress did not intend to confer power on FHWA to mandate that States meet Executive-established CO₂ emissions standards.

First, 23 U.S.C. § 150 does not give FHWA authority to mandate CO_2 emissions targets for States. In fact, according to the statute, it is the States that set the performance targets. 23 U.S.C. § 150(d) says, "each State shall set performance targets," while 23 U.S.C. § 150(c)(5) directs the Secretary to "establish measures for States to use to assess . . . on-road source emissions." (emphasis added). This language does not authorize the Secretary to establish the emissions targets to be met, and FHWA seems to recognize this because it claims the proposed GHG measure does "not mandate the level of the targets." ¹⁷ But, contrary to its claim, FHWA does exactly that in the proposed rule. In FHWA's own words, the proposed GHG measure "would require State DOTs and MPOs that have National Highway System mileage within their . . . boundaries . . . to establish declining CO_2 emissions targets to reduce CO_2 emissions generated by on-road mobile sources . . . that align with the Administration's net-zero targets." ¹⁸ This language used by FHWA is mandatory ¹⁹—and that means it is beyond the power Congress conferred.

Second, the newly enacted IIJA did not change the Agency's regulatory authority. As made explicit in a comment to this proposed rule by a group of U.S. Senators, the "IIJA established new programs to *incentivize* and *reward* state DOTs and MPOs for implementing emissions reduction strategies;" it did not authorize FHWA to *mandate* GHG performance targets the States would be required to meet.²⁰

 $^{^{16}}$ Id. at 42408 (citing Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, §§ 11105, 135 Stat. 429 (2021)).

Proposed GHG Measure, *supra* note 1, at 42401.

¹⁸ Id. at 42401 (emphasis added); see also id. at 42413 ("Proposed new § 490.105(e)(10) would require declining targets for reductions in tailpipe CO₂ emissions on the [National Highway System] that align with the 2030 and net-zero by 2050 emissions reduction targets discussed earlier."). In another place, it says, "State DOTs and MPOs would have the flexibility to set targets that work for their respective climate change policies and other policy priorities, so long as they are in line with the net-zero goals by 2050 set forth in this rule." Id. at 42402 (emphasis added).

¹⁹ And the way an agency talks about the rule matters. *See West Virginia v. EPA*, 142 S. Ct. at 2611–12 (finding the EPA was asserting an unprecedented and overly broad power by noting that the EPA itself recognized this in how it described the rule).

Republican Senator Comment, *supra* note 10 (emphases added); *see* Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, §§ 50201-222, 135 Stat. 429 (2021) *available at https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf* [hereinafter "IIJA"].

Indeed, according to Republican Senate Leader Mitch McConnell and Ranking Member of the Senate Committee on Environment and Public Works Shelley Moore Capito, "[n]othing in the IIJA provides FHWA with the authority to dictate how states should use their federal formula funding." And, as many comments to this proposed rule have noted, the Georgetown Climate Center's analysis of the IIJA was that Congress had not explicitly directed it to be used to address climate change:

IIJA could be an important part of the U.S. response to climate change. Or it could lead to more greenhouse gas pollution than the trajectory we are currently on. Where the actual outcome falls within that range will depend on the decisions made by state, federal, and local governments about how to spend the money made available by IIJA.²²

But the Agency need not rely on these assertions to know that Congress did not use the IIJA to expand its authority to include setting national emissions reduction targets that would be imposed on the States; it can simply look at the text and the legislative history. Nothing in the IIJA gives FHWA the authority to set CO₂ emissions targets for the States or directs that funding can be limited in this manner. And even the more climate-change focused version that was initially passed by the House did not extend FHWA's authority as broadly as the Agency now claims. The House version had a section devoted to carbon pollution reduction, in which it made funds available for States to set emissions goals and allowed the Secretary to shift federal funding for the fifteen states that performed the worst in meeting their goals.²³ In contrast, the codified version of the IIJA did not require the Secretary to evaluate the progress of the States in meeting emissions goals or condition funding on meeting any such goals.²⁴ FHWA is attempting to impose what Congress decided not to impose—and, indeed, to go even further because even the House version did not require the States to align their targets with a national, Executive-set target.

Accordingly, neither prior existing law nor the new IIJA provides FHWA with the authority to mandate that State DOTs and MPOs set emissions targets that align with the Administration's net-zero by 2050 target.

²¹ Letter from Senator McConnell and Senator Capito to State Governors (Feb. 9, 2022), available at www.epw.senate.gov/public/_cache/files/8/c/8c3b1b65-550b-493b-b6cd-

³³b108e53eac/B44AC4860614C4E3FD4712AAB8652E9C. 2022-02-07-general-iija-governors-letter.pdf.

²² Issue Brief: Estimate the Greenhouse Gas Impact of Federal Infrastructure Investments in the IIJA, GEORGETOWN CLIMATE CENTER (Dec. 16, 2021), https://www.georgetownclimate.org/articles/federal-infrastructure-investment-analysis.html.

H.R. 3684, 117th Congress (engrossed in House Jul. 1, 2021), at § 1213, available at https://www.congress.gov/bill/117th-congress/house-bill/3684/text/eh [hereinafter "House Version"]; see also Michael Laris, Infrastructure Proposal Creates a Program to Cut Emissions. Critics Say It's Missing Major Pieces, The Washington Post (Aug. 3, 2021), https://www.washingtonpost.com/transportation/2021/08/03/carbon-emissions-reduction-infrastructure/.

²⁴ IIJA, *supra* note 20, at § 11403.

B. Congress did not authorize FHWA to address climate change through action like the proposed GHG measure.

Furthermore, allowing FHWA to impose the proposed GHG measure would result in federal regulation of a vast portion of the American economy. For that, Congress has to "speak clearly," see *Util. Air. Regulatory Grp. v. EPA*, 573 U.S. 302, 324 (2014), and it has not.

This becomes immediately evident in the Agency's discussion of whether the term "performance" includes "environmental performance." The Supreme Court has rejected expansive constructions of statutes if allowing the broader interpretation would mean relying on a "cryptic" delegation of authority. *Brown & Williamson*, 529 U.S. at 160. Indeed, the Court has said that "[e]xtraordinary grants of regulatory authority are rarely accomplished through 'modest words,' 'vague terms,' or 'subtle devices." *West Virginia v. EPA*, 142 S. Ct. at 2609 (cleaned up). But vague references are all the Agency cites.

According to FHWA, including "environmental performance" in the definition of "performance" "is consistent with the national goals established under 23 U.S.C. 150(b)." That provision does indeed say that "[i]t is in the interest of the United States to focus the Federal-aid highway program on . . . environmental sustainability." 23 U.S.C. 150(b). But the provision of Section 150 that actually authorizes FHWA to establish performance measures says the Secretary "shall . . . limit performance measures only to those described in this subsection," and the subsection does not include a CO₂ measure. 23 U.S.C. § 150(c)(2)–(3) (emphasis added).

FHWA also relies on the IIJA's amendment to the purposes of the National Highway Performance Program.²⁷ But an interpretation of "performance" that includes "environmental performance" would be inconsistent with the statute.²⁸ Under 23 U.S.C. § 150(c)(3), the minimum standards and measures to be established are "for the purpose of carrying out section 119." Section 119 defines eligibility criteria for projects funded under the National Highway Performance Program and delineates the national goals that are relevant to the program: "infrastructure condition, safety, congestion reduction, system reliability, or freight movement on the National Highway System." 23 U.S.C. 119(d)(1). As the Agency noted in its repeal of

See e.g., Brad Plumer, To Cut Emissions to Zero, U.S. Needs to Make Big Changes in Next 10 Years, The New York Times (Dec. 15, 2020), https://www.nytimes.com/2020/12/15/climate/america-next-decade-climate.html (discussing a Princeton study that identified several "drastic changes" the U.S. would need to make, including having 50% of all new cars sold after 2030 be battery-powered, switching over one quarter of homes from natural gas or oil heats to electric heat pumps, and shut down "virtually all of the 200 remaining coal-burning power plants" by 2030).

²⁶ Proposed GHG Measure, *supra* note 1, at 42407.

²⁷ *Id.*; IIJA, *supra* note 20, at § 11105 (amending 23 U.S.C. 119(b)(4)).

²⁸ See 2018 Repeal, supra note 4, at 24924.

the previous GHG measure, "these goals are consistent with an interpretation of 'performance' that focuses on the physical condition of the system and the efficiency of transportation operations across the system, they do not support FHWA's . . . broader interpretation of 'performance'[.]" ²⁹

Indeed, a review of the purpose added by the IIJA demonstrates it, too, is focused on the physical condition of the highway system. The new language makes it a purpose of the program to provide "support for activities to increase the resiliency of the National Highway System to mitigate the cost of damages from sea level rise, extreme weather events, flooding, wildfires, or other natural disasters." This language does not authorize the Agency to support activities that attempt to prevent those natural disasters or climate change more generally, but instead to support "activities to increase the resiliency of the National Highway System to mitigate the cost of damages" from natural disasters. It is intended to address physical issues with our roads, not CO₂ emissions in the air.

A comparison of the House version and the final enacted version of the IIJA further demonstrates Congress' decision to not give FHWA expanded authority to address climate change. In the House version, the bill called for subsection (d) of 23 U.S.C. 119 to be amended by striking "or freight movement on the National Highway System" and inserting "freight movement, environmental sustainability, transportation system access, or combating climate change." The final version makes no such change. Similarly, there are a number of other places where the House version added language to focus on climate change but where such language was not included in the final enacted version of the IIJA.

Moreover, while it is far from clear that Congress has delegated any authority to regulate CO₂ emissions, it would seem more plausible that such delegation has been given to the EPA and not to FHWA. Indeed, whether authorized or not, the EPA has already taken steps to curb greenhouse gases and specifically CO₂ from mobile sources.³⁴ FHWA asserts that the proposed GHG measure is not duplicative of the EPA's efforts because the mandatory reporting would produce data not already

²⁹ *Id*.

Proposed GHG Measure, supra note 1, at 42408 (citing IIJA at § 11105).

House Version, *supra* note 23, at § 1201.

³² IIJA, *supra* note 20, at § 11105.

See, e.g., House Version, supra note 23, at § 1202 (amending 23 U.S.C. 134(i)(2) to add a climate change and resilience section requiring the transportation planning process to "assess strategies to reduce the climate change impacts of the surface transportation system and conduct a vulnerability assessment to identify opportunities to enhance the resilience of the surface transportation system and ensure the efficient use of Federal resources"); see also id. at § 1201 (amending 23 U.S.C. 119(e) by striking "analysis" and inserting "analyses, both of which shall take into consideration climate change adaptation and resilience").

³⁴ See, e.g., Environmental Protection Agency, Regulatory and Guidance Information by Topic: Air, https://www.epa.gov/regulatory-information-topic/regulatory-and-guidance-information-topic-air (describing how the EPA has set vehicle standards).

collected by EPA or DOE.³⁵ But this ignores the reality that FHWA used mandatory language not just for reporting, but also for requiring State DOTs and MPOs to set targets that align with the Administration's emissions targets. This is clearly an attempt to use the proposed GHG measure to address climate change. Given the Supreme Court recently made clear in *West Virginia v. EPA* that even the EPA cannot use its existing authority to take unprecedented and unauthorized actions to address climate change, such action is clearly beyond the authority Congress has given FHWA.

Congress must speak more clearly before FHWA may assert it has authority to mandate that all of the States and Puerto Rico decrease on-road CO₂ emissions in furtherance of the Administration's emissions goals. FHWA cannot simply say it "has reexamined th[e] determination from the 2018 repeal final rule" to assert "FHWA has authority." ^{36, 37} Even if it were not immediately clear from the statute that regulating in this manner is beyond the scope of the Agency's authority—and the undersigned believe it is—the Agency's back and forth about the definition of "performance" is evidence that it is relying only on "vague terms" or "cryptic delegations." And that simply is insufficient for FHWA to claim authority over a major question such as this.

C. The proposed GHG measure violates federalism principles.

American principles of federalism prohibit mandated action like the proposed GHG measure. "The Federal Government may not compel the States to enact or administer a federal regulatory program." New York v. United States, 505 U.S. 144, 188 (1992). This is because "the Constitution protects us from our own best intentions: It divides power among sovereigns and among branches of government precisely so that we may resist the temptation to concentrate power in one location as an expedient solution to the crisis of the day." Id. at 187. Therefore, even if Congress believed that the GHG measure was the best means of reducing CO_2 in order to address climate change, the States could not be directed to implement the policy choices of the federal government. 38 See Printz v. United States, 521 U.S. 898 (1997). This is why, in a comment on this proposed rule, a group of Republican U.S. Senators

³⁵ Proposed GHG Measure, *supra* note 1, at 42411–42412.

³⁶ Proposed GHG Measure, *supra* note 1, at 42408.

Nor does it matter that the Agency identified "[s]cientific literature published since the 2018 GHG measure repeal [that] provides greater certainty on the impact of human activities on the earth's current and future climate, as well as the urgency of actions to reduce human GHG emissions," *id.* at 42405. Such literature may be used by the Agency to explain why the action should not be considered arbitrary, but an action without statutory authority is always arbitrary. *See Motor Vehicle Mfrs. Ass'n of the U.S., Inc. v State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983) (explaining that an agency rule is "arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider").

The Constitution permits the Federal Government to hold out incentives to the States to encourage them to adopt a suggested regulatory scheme, *see*, *e.g.*, *South Dakota v. Dole*, 483 U.S. 203 (1987), but the proposed rule says that it would "require" action by the States, Proposed GHG Measure, *supra* note 1, at 42402, 42413.

clarified that the "IIJA established new programs to *incentivize* and *reward* state DOTs and MPOs for implementing emissions reduction strategies." ³⁹

Yet, FHWA attempts to force States to implement the President's climate change policy. As discussed above, despite saying that the proposed GHG measure does "not mandate the level of the targets," FHWA sets explicit mandatory targets. Indeed, the proposed GHG measure is explicitly imposed to further executive policy: "FHWA is proposing to require State DOTs and MPOs to set declining targets for reducing tailpipe CO₂ emissions on the [National Highway System] that align with the 2030 and 2050 targets set out in the Executive Orders[.]" Regulatory action cannot be used in this manner. Just because the President believes that reducing on-road CO₂ emissions is key to addressing climate change, does not mean FHWA can compel States to administer a federal regulatory program.

Federalism is not just an abstract constitutional principle; it ensures States will be able to protect the very real interests of their citizens. This becomes particularly evident when confronted with a rule like this one, which disproportionately impacts states with more rural areas. On average, rural residents drive ten miles more per day than urban residents. And States with higher average annual miles per driver tend to be more rural. And a result, drivers in States with more rural areas like Kentucky and many of the undersigned States will be more burdened by this rule. In the Agency's attempt to consolidate power to address a perceived crisis at the federal level, it fails to adequately consider the unique situation of each State. And that is why federalism prohibits action like the proposed GHG measure.

Republican Senator Comment, *supra* note 10 (emphases added).

⁴⁰ Proposed GHG Measure, *supra* note 1, at 42401.

⁴¹ *Id.*; see also id. at 42406 ("[T]he U.S. will target reducing emissions by 50 to 52 percent by 2030 compared to 2005 levels. . . . Additionally, FHWA is proposing to require State DOTs and MPOs to set declining targets for reducing tailpipe CO₂ emissions on the [National Highway System] that align with the 2030 and 2050 targets set out in the Executive Orders discussed previously in this section."); *id.* at 42413 ("Proposed new § 490.105(e)(10) would require declining targets for reductions in tailpipe CO₂ emissions on the NHS that align with the 2030 and net-zero by 2050 emissions targets[.]").

⁴² Proposed GHG Measure, *supra* note 1, at 42406.

Fact #759: December 24, 2012 Rural vs. Urban Driving Differences, DEPARTMENT OF ENERGY (Dec. 24, 2012), https://www.energy.gov/eere/vehicles/fact-759-december-24-2012-rural-vs-urban-driving-differences.

⁴⁴ Average miles driven per year by Americans, METROMILE (Sep. 13, 2021), https://www.metromile.com/blog/average-miles-driven-per-year-by-americans/.

⁴⁵ Janet Harrah, Kentucky Metropolitan Areas Out-Perform Rural and Small Urban Areas, The COMMUNITY RESEARCH COLLABORATIVE BLOG, https://crcblog.typepad.com/crcblog/kentucky-metropolitan-areas-out-perform-rural-and-small-urban-

areas.html#:~:text=Counties%20were%20designated%20as%20rural,remaining%2059%20are%20rur al%20counties (noting that based on 2010 data, just under half of the counties in Kentucky were considered rural).

D. The proposed GHG measure is arbitrary.

In addition to being outside its statutory and constitutional authority, the proposed GHG measure violates the Administrative Procedure Act. Executive agency action cannot be arbitrary or capricious. See FCC v. Fox Television Stations, Inc., 556 U.S. 502, 513 (2009). This means that, inter alia, the agency cannot rely on "factors which Congress has not intended it to consider," and the agency must "examine the relevant data and articulate a satisfactory explanation for its action." Motor Vehicle Mfrs. Ass'n of the U.S., 463 U.S. at 43. FHWA has violated both of these principles.

FHWA has said that it is proposing this rule to further the Executive's policy objectives for climate change, yet, as discussed above, Congress has not given it authority to address climate change. 46 By relying on climate change factors, FHWA has proposed an arbitrary action because agency action that relies on factors Congress has not authorized it to consider is arbitrary. See id.

Even if the proposed GHG measure were not *per se* arbitrary, FHWA also fails to articulate a satisfactory explanation for why it is imposing the GHG measure on the States. Agencies have significant leeway to exercise expert discretion, but when exercising it, they must justify the choices they make by providing the basis for exercising its expert discretion. *See Burlington Truck Lines, Inc. v. United States,* 371 U.S. 156, 167 (1962). And while "[a]n agency's view of what is in the public interest may change . . . [,] an agency changing its course must supply a reasoned analysis[.]" *Greater Boston Television Corp. v. FCC,* 444 F.2d 841, 852 (D.C. Cir. 1970); *see also Burlington,* 371 U.S. at 167 (noting that if an agency is not required to provide the reasoned analysis, it "can become a monster which rules with no practical limits on its discretion") (internal citation omitted).

The explanation given by FHWA for imposing a new version of the once-repealed GHG measure is that:

In light of the Agency's policy emphasis on using its available authorities to confront worsening climate change—as well as the new facts identified in reports issued between 2018 and 2021 that expand our knowledge of the severe consequences of climate change—FHWA reconsidered its legal authority, reexamined the assumptions regarding potential costs and potential duplication that underlay the repeal of the 2017 measure, and proposed adopting a GHG performance measure.⁴⁷

But this statement does not make the analysis reasoned. First, even according to the descriptions given by FHWA, these reports are not specific to on-road CO₂ emissions;

⁴⁶ Infra sections A and B.

⁴⁷ Proposed GHG Measure, *supra* note 1, at 42405.

they simply address greenhouse gases generally. FHWA's summary of the IPCC Sixth Assessment Report from 2021 is that it says human activities have increased atmospheric GHG emissions, which have raised the average surface temperature, and there may be "evidence linking human production of GHG emissions to extreme events such as heatwaves, heavy precipitation, droughts, and hurricanes." The 2018 reports discuss assertions that to limit global warming "would likely require decreasing global net anthropogenic CO₂ emissions[.]" These general climate change reports are not sufficient justification for why FHWA needs to impose mandatory onroad CO₂ emissions targets for all of the States.

Second, the reexamination of the assumptions regarding potential costs and duplication of efforts is based on a difference in policy, not technical expertise. FHWA rejects the Agency's earlier conclusion that it "was not possible to predict, with any degree of certainty, the extent to which the influence effects of the GHG measure might result in actual changes in emissions levels" and says that it now "anticipates that this proposed rule would result in substantial benefits that are neither speculative nor uncertain."50 Yet, in the same paragraph, FHWA says the "benefits are not easily quantifiable."51 FHWA then goes on to say that the "proposed GHG measure aligns with the national goal of reducing CO₂ emissions 50 to 52 percent below 2005 levels by 2030 in support of the Paris Agreement."52 This "national policy" that supports the Paris Agreement is part of an Executive policy; these are political choices, not exercises of technical expertise and discretion. And the numerous references to how the proposed GHG measure "aligns" with the Executive Orders establishing the net-zero targets⁵³ demonstrate the Agency is fully aware it is relying on Executive policy wishes. The failure to supply a reasoned analysis that provides a basis for exercising its technical discretion makes the proposed GHG measure arbitrary. Therefore, it must not be made final.

IV. Conclusion

For the reasons set forth above, the Attorneys General for the Commonwealth of Kentucky and the States of Alabama, Alaska, Arkansas, Florida, Georgia, Indiana, Kansas, Louisiana, Mississippi, Montana, Nebraska, Oklahoma, South Carolina, South Dakota, Texas, Utah, Virginia, West Virginia, and Wyoming respectfully request that FHWA not make this proposed rule final. We look forward to your response.

⁴⁸ *Id*.

⁴⁹ *Id.* at 42405–42406.

⁵⁰ *Id.* at 42410.

⁵¹ *Id.*; see also id. at 42404 ("The [regulatory impact analysis] discusses anticipated benefits of the rule qualitatively; they are not quantified because they are difficult to forecast and monetize.").

⁵² *Id.* at 42411.

⁵³ *Id.* at 42401, 42402–42403, 42406.

Respectfully submitted,

DANIEL CAMERON

Attorney General of Kentucky

TREG R. TAYLOR

Attorney General of Alaska

ASHLEY MOODY

Attorney General of Florida

tshly Mordy

TODD ROKITA

Attorney General of Indiana

JEFF LANDRY

Attorney General of Louisiana

AUSTIN KNUDSEN

Attorney General of Montana

JOHN M. O'CONNOR

Attorney General of Oklahoma

STEVE MARSHALL

Attorney General of Alabama

LESLIE RUTLEDGE

De L. P. Kull.

Attorney General of Arkansas

CHRIS M. CARR

Attorney General of Georgia

Denk Schmidt

DEREK SCHMIDT

Attorney General of Kansas

LYNN FITCH

Attorney General of Mississippi

DOUGLAS J. PETERSON

Attorney General of Nebraska

Man Wilson

ALAN WILSON

Attorney General of South Carolina

Page **13** of **13**

Mar

MARK VARGO Attorney General of South Dakota KEN PAXTON

Attorney General of Texas

SEAN D. REYES

Attorney General of Utah

JASON MIYARES

Bridget Still

Attorney General of Virginia

PATRICK MORRISEY

PATRICK Mom8

Attorney General of West Virginia

BRIDGET HILL

Attorney General of Wyoming



OFFICE OF ATTORNEY GENERAL STATE OF OKLAHOMA

October 13, 2022

Stephanie Pollack
Deputy Administrator, Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20560

RE: National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure

Docket No. FHWA-2021-0004

Dear Ms. Pollack:

The states of Oklahoma, Alabama, Alaska, Arkansas, Florida, Georgia, Indiana, Kansas, Kentucky, Louisiana, Mississippi, Montana, Nebraska, South Carolina, South Dakota, Texas, Utah and Virginia submit these comments in response to your invitation in the above-captioned docket. We are concerned that your proposal to amend the National Highway Performance Program (NHPP) performance management measures to add a greenhouse gas emission measure is an improper attempt to exceed statutory limits. Congress has created a program and appropriated some funding toward addressing carbon emissions on highways, and your proposal appears to second-guess Congress on how best to address carbon emissions. Your proposed rule would be unlawful, and your agency should decline to adopt it.

COMMENT 1: The proposed rule violates statutory text.

The national highway performance measures are assigned to four categories, most of which are tied to other statutes. The first three categories authorize performance measures to carry out "section 119," "section 148," and "section 149," respectively. 23 U.S.C. § 150(c)(3)-(5). Section 119 describes a series of projects that are permissible using NHPP funding, see id. § 119, while section 148 addresses highway safety improvement, see id. § 148, and section 149 addresses the Congesting Mitigation and Air Quality (CMAQ) improvement program, see id. § 149. The final category of performance measures addresses "freight movement on the Interstate System," a subset of the National Highway System.

These measures are intentionally limited to certain categories. Congress asserted broad goals for "the Federal-aid highway program" as a whole. *Id.* § 150(b). Then, despite the broad goals, Congress directed that "the Secretary shall . . . limit performance measures only to those described in this subsection." *Id.* § 150(c)(2)(C).

Your proposal inappropriately seeks to evade the limiting statute. *Id.* § 150(c)(2)(C). You broadly assert that you can write any performance measure under the broad goals described in subsection 150(b) through two creative readings of subsection 150(c). In particular, you appear to assert either that

Comments of Oklahoma et al. 2

(1) subsection 150(c)'s performance measures for section 119 are not limited to section 119 or that (2) performance measures for section 119 are only limited by the broad goals described in subsection 150(b). *See* 87 Fed. Reg. 42401, 42408. Neither proposal is a plausible reading of the statute.

In elaborating on your first interpretation, you assert that the limit on performance measures in $\S 150(c)(2)(C)$ only limits your agency to anything assessing performance on the Interstate System and the NHS. See 87 Fed. Reg. 42401, 42408. As you know, $\S 150(c)(3)(A)$ lists several requirements "for the purpose of carrying out section 119," including "measures for States to use to assess—(IV) the performance of the Interstate System; and (V) the performance of the National Highway System (excluding the Interstate System." 23 U.S.C. $\S 150(c)(3)(A)(ii)$. As you explain, you view $\S 150(c)(3)(A)(ii)(IV)$ –(V) as only bounded by the "seven national goals" in $\S 150(b)$ and not by the reference to section 119 in that same subsection.

Your proposed reading of the statute is errant because it renders the limit in § 150(c)(2)(C) meaningless. It is a "rudimentary canon of statutory construction that [] superfluities are to be avoided." *Chevron Mining Inc. v. United States*, 863 F.3d 1261, 1274 (10th Cir. 2017) (quoting *Lockheed Martin Corp. v. Admin. Review Bd.*, 717 F.3d 1121, 1130 (10th Cir. 2013)); *see also TRW Inc. v. Andrews*, 534 U.S. 19, 31 (2001). A limit that only required a relationship to the National Highway System would be no limit at all because any national highway performance measure must relate to the NHS. Thus, if § 150(c) authorizes any performance measure related to the NHS, the "limit" language in § 150(c)(2)(C) would be meaningless, which is contrary to statutory canons.

You likely understand the flaw in your statutory interpretation because you do not follow this method in reading the rest of the statute. As you know, § 150(c)(5)(B) requires measurements for "on-road mobile source emissions," and carbon under your definition is an on-road mobile source emission. Nevertheless, as you admit in your proposal, performance measurements for "on-road mobile source emissions" are limited to performance measures "for the purposes of carrying out the CMAQ Program" under section 149. See 87 Fed. Reg. 42401, 42408. There is no statutory interpretation method that would endorse reading § 150(c)(5) as limited to section 149 but also read § 150(c)(3) as not limited to section 119. Your own interpretation of § 150(c)(5) indicates that you do not truly believe your unbounded interpretation of § 150(c)(3).

The correct interpretation of § 150(c)(3) is that § 150(c)(3)(A)(ii)(IV)–(V) describes the manner of recording performance measures for Section 119. The relevant subsection specifies that it is "for the purpose of carrying out section 119," 23 U.S.C. § 150(c)(3)(A), before requiring separate measurements for the Interstate System (a subset of NHS) and for the NHS (excluding the Interstate System), id. § 150(c)(3)(A)(ii)(IV)–(V). The most straightforward reading of this statute is that Congress wanted to know how Section 119 funds are affecting Interstate System roads separately from how Section 119 funds are affecting other NHS roads. These provisions in a subsection about Section 119 do not empower the agency beyond its Section 119 authority.

In elaborating on your second interpretation, you appear to recognize the statutory problems with your first interpretation and seek to ground your proposed rule in Section 119. See 87 Fed. Reg. 42401, 42408. As you explain, you believe that because (1) the states' asset management plan described in section 119(e) must support progress toward the goals in § 150(b), and because (2) one of the goals in section 119(b) is to increase resilience to mitigate the cost of damages from environmental harm, section 119 "provides additional statutory support for the GHG measure." *Id*.

Comments of Oklahoma et al. 3

PageID 4451

You admit, as you must, that section 119(d) sets limits for the use of NHPP funds. See id. You acknowledge that your agency previously held under a different administration that it could not spend funds on a greenhouse gas measure because such a measure is not related to the subset of national performance goals specified in section 119(d)(1). See id. You appear to disagree with this view because you believe that you can ignore the list of performance goals in section 119(d)(1) if you satisfy one or more criteria in section 119(d)(2). See id. In particular, you observe that permissible uses of funding under Section 119(d)(2) include supporting development of a state asset management plan under section 119(e) or environmental mitigation efforts under section 119(g).

With respect, it appears you have made a substantial mistake in reading section 119(d) by missing that it includes the word "and." Section 119(d) states that funds "may be obligated only for a project on an eligible facility" that satisfies the criteria in section 119(d)(1)(A) "and" 119(d)(1)(b) "and for 1 or more of the following purposes" under 119(d)(2). See 23 U.S.C. § 119(d). You do not dispute, as you cannot, that section 119(d)(1)(A) limits the use of funds to projects "toward the achievement of national performance goals for improving infrastructure condition, safety, congestion reduction, system reliability, or freight movement," a list that noticeably omits the environmental goals. Id. § 119(d)(1)(A). Thus, whatever merit there is to your reading of § 119(d)(2), it is indisputable that the greenhouse gas measure cannot satisfy all three of the relevant criteria because it is not permissible under § 119(d)(1)(A).

To be sure, the express terms of section 119(d)(1)(A) apply to "funds apportioned to a State" and are not aimed directly at your agency. *See id.* § 119(d)(1)(A). Nevertheless, because the relevant performance measures must be "for the purpose of carrying out Section 119," they must be related to projects that are funded in "carrying out Section 119." *Id.* § 150(c)(3)(A). Any other reading would construe your authority over performance measures as unbounded, reducing both of your proposed statutory interpretations to the sole theory that you are unbounded by Section 119 in drafting rules for § 150(c)(3). As explained previously, that view is untenable under the text of the statute.

In short, your agency can only adopt performance measures described by Congress, and Congress did not give you unbounded authority to adopt any measure related to the NHS, nor did Congress include greenhouse gas measures in permissible projects under Section 119. Your proposed rule is not in accordance with law, and you should decline to adopt it.

COMMENT 2: The proposed rule contradicts the statutory structure.

Even aside from the textual flaws, your proposed rule also contradicts the structure of the relevant statutes. "It is a fundamental canon of statutory construction that the words of a statute must be read in their context and with a view to their place in the overall statutory scheme." W. Virginia v. Envtl. Prot. Agency, 142 S. Ct. 2587, 2607 (2022) (quoting Davis v. Michigan Dept. of Treasury, 489 U.S. 803, 809 (1989)). Your proposed rule devotes significant time to alleging issues with carbon emissions, but it fails to substantially acknowledge that Congress has already addressed carbon reduction. See 23 U.S.C. § 175. Congress has dedicated funding for projects that "support the reduction" of "carbon dioxide emissions from on-road highway sources of those emissions within a State." Id. § 175(a)(2), (c)(1).

Despite the creation of this carbon reduction program, Congress did not include the program in the described performance measures. *See id.* § 150(c). Congress was aware of the option of performance measures for emissions, as it included the requirement to assess "on-road mobile source emissions" for the CMAQ program. *Id.* § 150(c)(5). Nevertheless, Congress did not include Section 175 in the

programs subject to emissions measures. In fact, Congress left the sole quantification of carbon emissions in statute "at the discretion of the State." *Id.* § 175(d)(2)(D).

That carbon program is not the only program omitted from performance measures in § 150(c). Beyond the programs listed in that subsection, the federal government also funds the Surface Transportation Block Grant Program (section 133), Metropolitan Planning (section 134), the National Highway Freight Program (section 167), and the PROTECT program (section 176). See id. § 104(b). Congress did not designate any of these programs for performance measures, and the only performance measure that is not restricted to a particular program is freight movement on the Interstate System. See id. § 150(c). The clear inference from this structure is that Congress made a deliberate choice to set performance measures for some programs and not set performance measures for other programs.

Your proposal to include carbon measures and carbon reduction under the NHPP is an improper attempt to avoid Congress's structure for performance measures. By creating a separate program for carbon reduction, Congress indicated that carbon reduction was not part of existing highway programs, including the NHPP. Your attempt to add carbon reduction to NHPP performance measures improperly second-guesses Congress on which highway programs need performance measures.

In short, Congress funds carbon reduction as part of a highway program it chose not to measure. You cannot collapse carbon reduction into the NHPP without setting aside Congress's policy choices on what to measure and what not to measure. Accordingly, your proposed rule violates the structure of the statutes and exceeds your statutory authority.

COMMENT 3: The proposed rule violates the Appropriations Clause.

Your proposed rule also inappropriately seeks to rebalance Congress's funding priorities. The U.S. Constitution's Appropriations Clause specifies that "No Money shall be drawn from the Treasury, but in Consequence of Appropriations made by Law." U.S. Const. art. 1, § 9, cl. 7. Congress, in turn, has appropriated approximately 2.56% of state highway funds (after certain fixed distributions) to carbon reduction, and it has appropriated approximately 59.08% of the same funds to the NHPP. See 23 U.S.C. § 104(b)(1), (b)(7). By attempting to spend NHPP funds on carbon reduction, you are attempting to alter Congressional appropriations to reach your preferred spending on carbon reduction. You do not have the authority either to alter appropriations or to direct States to spend those funds differently than Congress appropriated. Accordingly, your proposed rule violates the Appropriations Clause.

COMMENT 4: The proposed rule fails to consider the Major Questions doctrine.

Your tenuous textual theories also fail to consider the Major Questions doctrine. Courts "presume that Congress intends to make major policy decisions itself, not leave those decisions to agencies." W. Virginia, 142 S. Ct. at 2609 (internal quotation marks and citation omitted). Even if your agency has "a colorable textual basis" or a "merely plausible textual basis" for a proposed rule, it cannot enact major policy changes without demonstrating "clear congressional authorization" for the power it claims. Id.

Comments of Oklahoma et al. 5

The proposed rule would be a major policy decision. By its plain text, it purports to direct state departments of transportation in all 50 states to begin new regulations of greenhouse gas emissions, including both monitoring and reducing those emissions. This radical change in state highway funding would reallocate funding from other existing highway priorities to address carbon emissions to the detriment of other policy goals in highway funding. Your extensive analysis about the alleged need for "Confronting the Climate Crisis," 87 Fed. Reg. 42401, 42405-42407, confirms that your proposed rule would be a major policy change to existing rules.

The proposed rule also lacks clear congressional authorization. As stated above, we believe your rule lacks any textual basis. *See supra* Comment 1. Because you appear to disagree, though, you must explain how your tenuous textual theories amount to clear Congressional authorization. We view it as highly unlikely that any court would agree that a statutory interpretation that disregards limits in the statute qualifies as clear congressional authorization.

In short, if you disagree with our first comment and believe you have a textual basis for your rule, you should still decline to adopt the rule because you have not identified any clear congressional authorization for the major policy change you propose.

COMMENT 5: The analysis of the proposed rule should not rely on the values of the social cost of CO2 published by the Interagency Working Group on Social Cost of Greenhouse Gases.

The Interagency Working Group's "interim" social costs of greenhouse gases ("Interim Estimates") are not a reliable measure of costs and benefits. Using them to calculate your break-even estimates is improper because they almost certainly overstate the benefits, meaning that the reductions required to equal estimated compliance costs are far higher than what you predict in your notice.

Your agency should not use the Interim Estimates because they cannot withstand any serious scrutiny. The IAM-based calculation of so-called "social costs" of greenhouse gases involves wildly speculative guesswork that purports to project the course of all human history for 300 years into the future including future migration, technological developments, conflicts, adaptation patterns, and mitigation measures. The 2021 Technical Support Document (2021 TSD), announcing the Interim Estimates, admits that the methodology does "not reflect the tremendous increase in the scientific and economic understanding of climate-related damages that has occurred in the past decade." Louisiana v. Biden, No. 21-1074, Doc. 55-27, at 22 (W.D. La. July 27, 2021). It also concedes that the important choice of discount rate is a naked policy decision that "raises highly contested and exceedingly difficult questions of science, economics, ethics, and law." Id. at 17. The discount rate plays an outsized role because the Interagency Working Group's time horizon for global damages is the year 2300. The Interagency Working Group had to change one of the three IAMs because its default time horizon was the year 2200—"too short a time horizon because it could miss a significant fraction of damages under certain assumptions." Louisiana v. Biden, No. 21-1074, Doc. 55-6, at 25 (2010 TSD) (W.D. La. July 27, 2021). The Interagency Working Group also had to speculate "GDP, population, and greenhouse gas emission trajectories after 2100, the last year for which these data are available from the" input models. Id.

Even without the benefit of statisticians and data scientists, these facts raise serious questions about the validity and reliability of the methodology that created the Interim Estimates. Other agencies have previously refused to credit these estimates, and you fail to explain why you disagree with their view on the Interim Estimates. E.g., EarthReports, Inc. v. Fed. Energy Regul. Comm'n, 828 F.3d 949, 956 (D.C. Cir. 2016) (noting social cost of carbon methodology unfit for use in FERC proceedings). If you continue relying on the Interim Estimates for your regulatory impact analysis, you should address the deficiencies raised in this comment and should address your reasons for departing from FERC's view on the reliability of the Interim Estimates.

We recognize that you stated that "[t]he break-even estimates are not intended [to] justify the proposed rule," 87 Fed. Reg. 42401, 42417. Nevertheless, your extensive regulatory impact analysis belies that suggestion, especially since you requested comment on your analysis. If you believe the Interim Estimates accurately represent your views to the extent feasible, then you should address our concerns with the Interim Estimates in any decision to use them.

COMMENT 6: You cannot lawfully use a backdated effective date.

As written, your rule requires that States comply with the GHG performance measure on October 1, 2022. 87 Fed. Reg. 42401, 42412. That date may be a typographical error, as it seems unlikely you intended an effective date before you have even finished accepting comments on the proposed rule. Nevertheless, we do want to remind you that any proposed effective date must be at least 30 days after publication of any rule. See 5 U.S.C. § 553(d). Thus, if you disagree with our comments and proceed with adopting the rule anyway, we request that you adopt a lawful effective date in any final rule.

We appreciate the opportunity to comment on your proposed rule, and we hope that you will decline to adopt it.

Sincerely,

JOHN M. O'CONNOR

Oklahoma Attorney General

Alabama Attorney General

LESLIE RUTLEDGE Arkansas Attorney General TREG TAYLOR

Alaska Attorney General

ASHLEY MOODY

Florida Attorney General

CHRIS CARR

Georgia Attorney General

TODD ROKITA

Indiana Attorney General

DEREK SCHMIDT

Kansas Attorney General

DANIEL CAMERON
Kentucky Attorney General

JEFF LANDRY Louisiana Attorney General

LYNN FITCH
Mississippi Attorney General

AUSTIN KNUDSEN Montana Attorney General Douglas J. Peterson Nebraska Attorney General

ALAN WILSON South Carolina Attorney General

MARK VARGO South Dakota Attorney General

KEN PAXTON
Texas Attorney General

SEAN REYES Utah Attorney General

JASON MIYARES
Virginia Attorney General

CC: Secretary Pete Buttigieg



KEN PAXTON ATTORNEY GENERAL OF TEXAS

October 13, 2022

Ms. Stephanie Pollack Deputy Administrator Federal Highway Administration Docket Management Facility U.S. Department of Transportation [Submitted electronically via www.regulations.gov]

RE: Notice of Proposed Rulemaking Docket No. FHWA-2021-0004: RIN 2125-AF99

National Performance Management Measures; Assessing Performance of National Highway System, Greenhouse Gas Emissions Measure

Dear Ms. Pollack:

As the chief legal officer of the State of Texas, I am writing to urge withdrawal of the proposed "National Performance Management Measures: Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure" (the "GHG Measure"), either in whole or as it relates to Texas. This proposed rulemaking constitutes federal agency overreach because, as provided below, Congress has not directed or authorized the Federal Highway Administration ("FHWA") to regulate greenhouse gases. Moreover, the Office of the Attorney General of Texas fully supports and incorporates here the Texas Department of Transportation's ("TxDOT") comments, which identify a litany of additional issues the FHWA failed to consider prior to proposing the GHG Measure.

The FHWA seeks to resurrect the greenhouse gas measure it concluded in 2018 was inappropriate under the Moving Ahead for Progress in the 21st Century Act ("MAP-21") and takes this version of the proposed rule even further by mandating that state agencies identify declining CO₂ targets equal to net-zero emissions by 2050. The FHWA includes this additional requirement without identifying sufficient statutory authority because none exists. The FHWA thus ignores the cooperative federalism embodied in MAP-21, usurping the States' primary role in setting performance measure targets. And this measure is even more aggressive than a similar greenhouse gas measure that failed to pass State of Texas Comments on Docket No. FHWA-2021-004 Page 2 of 13

Congress. The FHWA may not avoid the intent of Congress, formed through compromise, and undertake by rulemaking what Congress declined to do by law. The FHWA must respect the primary role of States in carrying out the Federal-Aid Highway Program and withdraw this proposed GHG Measure.

Background

23 U.S.C. § 150(c)(3)(ii) directs the Secretary of Transportation to establish measures for States to use to assess:

- the condition of pavements on the Interstate system;
- the condition of pavements on the National Highway System (excluding the Interstate);
- the condition of bridges on the National Highway System;
- the performance of the Interstate System; and
- the performance of the National Highway System (excluding the Interstate System).

Notably, section 150(c)(3)(ii) provides that the measures the FHWA establishes are "for States to use" in administering the National Highway Performance Program ("NHPP").¹ The NHPP is State-focused; and, as the FHWA itself admitted, "State DOTs and MPOs have the authority to establish their targets at their discretion. The MAP-21 does not provide FHWA the authority to approve or reject State DOT or MPO established targets."² The proposed rulemaking does not even attempt to justify FHWA's reversal.

Section 150 also specifically limits FHWA's authority to establish performance measures. 23 U.S.C. § 150(c)(2)(C) provides that, when promulgating performance measures, the FHWA "shall...limit performance measures only to those described in this subsection." FHWA may not establish any measure it likes simply because it finds it expedient.

Additionally, in 2021, Congress passed the bipartisan Infrastructure Investment and Jobs Act³ ("IIJA"). The initial house bill contained a section

¹ 23 U.S.C. § 150(c)(3)(ii) (emphasis added).

² National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program, 82 Fed. Reg. 5922 (Jan. 18, 2017) ("2017 GHG Measure").

³ Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat 429 (2021).

State of Texas Comments on Docket No. FHWA-2021-004 Page 3 of 13

establishing "in consultation with the Administrator of the Environmental Protection Agency, measures for States to use to assess: (A) carbon dioxide (CO₂) emissions per capita on public roads; (B) carbon dioxide emissions using different parameters than described in subparagraph (A) that the Secretary determines to be appropriate; and (C) any other greenhouse gas emissions on public roads that the Secretary determines to be appropriate," and provided that States could not establish a "regressive target" for the greenhouse gas measure above. But these sections appear nowhere in the enacted bill, disappearing in the engrossed Senate amendment. This means Congress declined to pass a substantially identical greenhouse gas measure to the one FHWA now seeks to promulgate by rule.

In 2017, the FHWA promulgated a final rule, 82 FR 5970-01 (the "2017 Rule"), which established a measure of the percent change in CO₂ emissions from the reference year 2017, generated by on-road mobile sources on the NHS (the 2017 Rule).⁴ Although the State of Texas asserts this prior rule overstepped the bounds of the FHWA's authority, the measure only required State Departments of Transportation ("State DOTs") and Metropolitan Planning Organizations ("MPOs") to measure annual tons of CO₂ from all on-road mobile sources on the NHS and set their own targets. It did not purport to require States to set declining targets in accordance with a FHWA timeline derived solely from an executive order.

Like the proposed GHG Measure, the 2017 Rule relied on a strained reading of section 150(c)(3)(A)(ii)(IV)–(V) by interpreting "performance" of the Interstate and National Highway Systems to include the general effect on climate change of emissions produced while driving on the NHS. This interpretation inappropriately refers to the general goals for the Federal-Aid Highway Program set out in a different subsection, 23 U.S.C. § 150(b).

In 2018, the FHWA reversed course and repealed the portion of the 2017 Rule establishing a CO₂ measure. In doing so, the FHWA consulted 23 U.S.C. § 119, the section of the statute that specifically lays out the NHPP under which FHWA sought to establish the CO₂ measure.

⁴ 2017 GHG Measure.

State of Texas Comments on Docket No. FHWA-2021-004 Page 4 of 13

Under section 119(d), NHPP funds may *only* be used for a project that fulfills three separate criteria. The project must be:

- 1. a project or part of a program of projects supporting progress toward the achievement of national performance goals for improving infrastructure condition, safety, congestion reduction, system reliability, or freight movement on the National Highway System; AND
- 2. consistent with sections 134 and 135; AND
- 3. for at least one of the purposes listed in 119(d)(2)(A-S).

23 U.S.C. § 119(d) (emphasis added).

The FHWA considered the first requirement above and acknowledged that the outlined national performance goals (improving infrastructure condition, safety, congestion reduction, system reliability, or freight movement on the National Highway System) were "consistent with an interpretation of 'performance' that focuses on the physical condition of the system and the efficiency of transportation operations across the system."⁵

The FHWA also pointed out that Congress specifically designated a part of section 150(c) for on-road mobile source emissions, limiting the types of emissions that could be the subject of a performance measure to those listed in the Congestion Mitigation and Air Quality ("CMAQ") statute (23 U.S.C. 149(b)). In light of the fact FHWA must "limit performance measures only to those described in [§ 150(c)]", and the measure for on-road mobile source emissions measures described in 150(c) is limited to CMAQ program emissions, the FHWA correctly concluded that "the term 'performance' as it relates to the Interstate System and the National Highway System is better read not to encompass measures relating to CO₂, as previously concluded by FHWA in adopting the GHG measure in January 2017."⁶

_

⁵ National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program, 83 Fed. Reg. 24924 (May, 31, 2018) ("2018 Rule Repeal").

⁶ Id.

State of Texas Comments on Docket No. FHWA-2021-004 Page 5 of 13

The proposed GHG Measure violates MAP-21, was directly rejected by Congress, and exceeds the FHWA's statutory authority.

I. There is no statutory authority allowing the FHWA to establish a greenhouse gas measure.

Now, four years later, the FHWA seeks to resurrect the 2017 Rule, with the added requirement that States set declining targets to align with the current administration's goals of 50 to 52 percent emissions reductions by 2030 and net-zero emissions by 2050.

In establishing this measure, the FHWA jettisons its 2018 better reasoned (and appropriate) reading of the statute and stretches the definition of "performance" beyond any intent of Congress.

As discussed above, section 119(d) limits the projects NHPP may fund to those that are "a project ... supporting progress towards the achievement of national performance goals for improving infrastructure condition, safety, congestion reduction, system reliability, or freight movement on the National Highway System[.]" The FHWA attempts to wave away the limitations in 119(d) by falsely claiming it does not account for all factors: "Section 119(d)(1), Title 23, U.S.C., establishes eligibility criteria for using funds apportioned to a State for carrying out the NHPP, but does not set forth all relevant considerations for carrying out the program. For example, 23 U.S.C. 119(d)(2) identifies purposes for eligible projects, including development and implementation of a State DOT's asset management plan for the NHS under 23 U.S.C. 119(e) and environmental mitigation efforts related to projects funded under 23 U.S.C. 119(g)."

But this reading completely ignores the actual statutory language—the statute establishes that NHPP funds may only be obligated for a project that "support[s] progress towards the achievement of national performance goals for improving infrastructure condition, safety, congestion reduction, system reliability, or freight movement on the National Highway System; and ..." is

_

⁷ 23 U.S.C. § 119(d)(1).

⁸ National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure, 87 Fed. Register 42408-09 (July 15, 2022) ("Proposed 2022 GHG Measure").

State of Texas Comments on Docket No. FHWA-2021-004 Page 6 of 13

for "1 or more of the [purposes laid out in 119(d)(2)]." The FHWA attempts to argue that section 119(d)(1) does not set forth all the relevant considerations for carrying out the program—despite a laundry list of purposes included in section 119(d)(2), none of which include anything to authorize the GHG Measure. Therefore, the FHWA needs authorization from a different statute.

Looking back to section 150(c)(2)(C), this statute directs the FHWA to "limit performance measures only to those described in this subsection." But the FHWA claims that "[t]he provision limits FHWA's authority to establish measures States use to assess performance only to the Interstate System and the NHS. However, the provision does not otherwise limit the meaning of 'performance."¹⁰

The FHWA's argument proves too much. Under its reading, the FHWA would be enabled to promulgate any performance measures it found convenient, as long as the FHWA could shoehorn the measure into a nebulous, allencompassing definition of "performance." This reading resembles the one rejected by the Supreme Court in *West Virginia v. EPA*:

All the Government can offer, however, is the Agency's authority to establish emissions caps at a level reflecting "the application of the best system of emission reduction ... adequately demonstrated." As a matter of "definitional possibilities," generation shifting can be described as a "system"—"an aggregation or assemblage of objects united by some form of regular interaction,"—capable of reducing emissions. But of course almost anything could constitute such a "system"; shorn of all context, the word is an empty vessel. Such a vague statutory grant is not close to the sort of clear authorization required by our precedents. 11

As in *West Virginia v. EPA*, "shorn of all context" the word "performance" could conceivably include environmental performance—but without that context the word is an empty vessel. And "[e]xtraordinary grants of regulatory authority are rarely accomplished through modest words, vague terms, or subtle devices." ¹²

⁹ 23 U.S.C. 119(d)(emphasis added).

¹⁰ Proposed 2022 GHG Measure at 42408.

¹¹ W. Virginia v. Envtl. Prot. Agency, 142 S. Ct. 2587, 2614 (2022).

¹² *Id*. (internal punctuation omitted).

State of Texas Comments on Docket No. FHWA-2021-004 Page 7 of 13

Under 150(c), emissions limits are tied to the CMAQ. But CO₂ is neither a CMAQ emission, nor a surrogate for any CMAQ emission. And there are no nonattainment and maintenance areas for CO₂.

The FHWA attempts to sidestep the existence of the CMAQ program and the fact it does not include CO₂ as a pollutant, by claiming that "[s]ince Congress did not expressly limit emissions measures to those related to CMAQ, it is reasonable to conclude that Congress intended FHWA to retain the discretion to adopt other emissions measures, such as the GHG measure." But this statement is exactly backwards when promulgating rules. Agencies are creatures of statute and have no powers outside those granted by statute. Agency power must be expressly granted by statute, not expressly limited. And "[w]ere courts to presume a delegation of power absent an express withholding of such power, agencies would enjoy virtually limitless hegemony, a result plainly out of keeping with *Chevron* and quite likely with the Constitution as well." ¹⁵

Perhaps recognizing that sections 150 and 119 do not support, and in fact disallow, the FHWA's measure, the FHWA takes the shotgun approach, casting about for support in numerous statutory provisions that, again, do not actually support the proposed GHG Measure:

• 23 U.S.C. 150(b)(6)

o 23 U.S.C. 150(b)(6) is arguably the centerpiece of the FHWA's argument for its authority. But 150(b) is a set of general goals for the highway program—it does not grant the FHWA any authority to take concrete action. Statutes involve both purposes and means. Declarations of purpose are not carte blanche authority for agencies to use any means they find helpful to achieve those purposes: like other administrative agencies, the FHWA "must abide not only by the ultimate purposes Congress has selected, but

¹³ Proposed 2022 GHG Measure at 42410.

¹⁴ Killip v. Office of Pers. Mgmt., 991 F.2d 1564, 1569 (Fed. Cir. 1993).

¹⁵ Railway Labor Execs.' Ass'n v. Nat'l Mediation Bd., 29 F.3d 655, 671 (D.C. Cir. 1994), amended, 38 F.3d 1224 (D.C. Cir. 1994).

State of Texas Comments on Docket No. FHWA-2021-004 Page 8 of 13

by the means it has deemed appropriate, and prescribed, for the pursuit of those purposes."¹⁶

• 23 U.S.C. § 119(e)(2)

o 23 U.S.C. § 119(e)(2) is a section requiring State asset management plans to contain projects supporting progress towards the general goals set out in 150(b). This section is a limitation on the State asset management plan—that the plan will not support projects working against the goals in 150(b). It is not a grant of authority to the FHWA to mandate any performance measure it thinks could support one of the goals in 150(b).

• 23 U.S.C. 101(b)(3)(G)

o 23 U.S.C. 101(b)(3)(G) is a general declaration by Congress that "transportation should play a significant role in promoting economic growth, improving the environment, and sustaining the quality of life[.]" This passage gives no authority to the FHWA to determine how transportation shall improve the environment.

• 23 U.S.C. 134(a)(1)

o 23 U.S.C. 134(a)(1) is a general declaration in the Metropolitan transportation planning section that it is in the national interest to promote various goals, including "tak[ing] into consideration resiliency needs while minimizing transportation-related fuel consumption and air pollution through metropolitan and statewide transportation planning processes identified in this chapter[.]" Again, this passage gives no means authority to the FHWA and in fact states that it is in the national interest to accomplish these goals "through metropolitan and statewide transportation planning processes identified in this chapter," not "through any means the FHWA finds appropriate."

¹⁶ Nat'l Ass'n of Broadcasters v. Fed. Communications Comm'n, 39 F.4th 817, 820 (D.C. Cir. 2022) (internal quotation marks omitted).

State of Texas Comments on Docket No. FHWA-2021-004 Page 9 of 13

• 23 U.S.C. 134(c)(1)

O 23 U.S.C. 134(c)(1) instructs metropolitan planning organizations to develop transportation plans and programs "through a performance-driven, outcome-based approach to planning for metropolitan areas of the state." Nowhere in this section does it grant the FHWA free-wheeling authority to mandate any measure it feels will protect the environment.

• 23 U.S.C. 134(h)

- o 23 U.S.C. 134(h)(1) is, similarly, an instruction that MPOs should carry out a planning process for projects that will, among other things, "protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns...[and] improve the resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation." Nothing in this section is a grant of authority for the FHWA to require state DOTs to regulate GHGs and set declining targets for GHGs consistent with goals set out in executive orders.
- o 23 U.S.C. 134(h)(2) instructs MPOs to use "a performance-based approach to transportation decision making to support the national goals described in section 150(b) of this title and the general purposes described in section 5301 of title 49." Again, this instructs MPOs to conform their programs to support the national goals for the NHS—but gives the FHWA no authority to order States or MPOs to protect the environment by any means it finds convenient.

• 23 U.S.C. 135(d)(1)

o 23 U.S.C. 135(d)(1) is, similarly, an instruction that States should carry out a planning process for projects that will, among other things, "protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency

State of Texas Comments on Docket No. FHWA-2021-004 Page 10 of 13

between transportation improvements and State and local planned growth and economic development patterns...[and] improve the resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation." Nothing in this section is a grant of authority for the FHWA to require state DOTs to regulate GHGs.

• 23 U.S.C. 135(d)(2)

o 23 U.S.C. 135(d)(2) instructs States to use "a performance-based approach to transportation decision making to support the national goals described in section 150(b) of this title and the general purposes described in section 5301 of title 49." Again, this instructs States to conform their programs to support the national goals for the NHS—but gives the FHWA no authority to order states to protect the environment by any means it finds convenient.

II. The FHWA does not even attempt to justify its imposition of a requirement of net-zero emissions by 2050.

The FHWA recognizes that it has no authority to "approve or reject State DOT or MPO established targets." ¹⁷ Because of this, the FHWA incredibly attempts to claim that it does not "mandate the level of the targets. Rather, State DOTs and MPOs would have flexibility to set targets that are appropriate for their communities and that work for their respective climate change and other policy priorities, as long as the targets would reduce emissions over time." ¹⁸ Regarding the 2050 deadline, this benchmark is inconsistent with the FHWA's own statement recognizing its lack of authority to mandate targets. Essentially, the FHWA offers to let States choose any number of interim two- and four-year targets leading up to 2050—so long as the final target is zero—even though the FHWA has no authority to mandate any specific target at all, including net-zero by 2050.

Further, the FHWA identifies no authority allowing it to dictate State performance measure targets. And it identifies no limit on this theoretical authority. If the FHWA may require State DOTs to reduce on-road mobile

¹⁷ 2017 GHG Measure at 5897.

¹⁸ Proposed 2022 GHG Measure at 42401 (emphasis added).

State of Texas Comments on Docket No. FHWA-2021-004 Page 11 of 13

emissions 50-52 percent by 2030 and net-zero by 2050, what would stop the FHWA from decreeing that States must reduce on-road mobile emissions to net zero the very next year—a task that would require a huge overhaul of the American economy, the way of life of all Americans, and in any event, likely is not possible for State DOTs to accomplish with *any* degree of effort. TxDOT's comments provide further details demonstrating the absurdity of these targets if the FHWA continues with this rulemaking and the impossibility for States, especially the State of Texas, to meet these requirements.

III. The FHWA, MPOs, and State DOTs have no experience in environmental policymaking.

Administrative agencies are creatures of statute and have only the limited powers granted them under statute.¹⁹ An administrative agency has no authority to act outside of the statute, and any action it takes outside of those bounds is void.²⁰ And "[a]s a matter of statutory construction, statutes granting power to administrative agencies are strictly construed as conferring only those powers granted expressly or by necessary implication."²¹

Further, administrative agencies' powers are restricted to the realm of their expertise. "When an agency has no comparative expertise in making certain policy judgments, we have said, Congress presumably would not task it with doing so." And where agencies seek authority to promulgate regulations with major economic and political significance, there is "reason to hesitate before concluding that Congress meant to confer such authority." ²³

The FHWA consistently downplays the effects that will result from requiring all transportation on the NHS to be carbon-neutral in the identified short time period—it would significantly change the affordability, availability, and method of travel for tens of millions of Americans and necessitate a complete overhaul of States' transportation infrastructure. The FHWA estimates that the regulation "would not have sufficient federalism implications to warrant the preparation of a federalism assessment," that the GHG Measure "is not anticipated to have a significant economic impact on a substantial number of

_

¹⁹ Killip v. Office of Pers. Mgmt., 991 F.2d 1564, 1569 (Fed. Cir. 1993).

²⁰ Louisiana Pub. Serv. Comm'n v. F.C.C., 476 U.S. 355, 357 (1986).

²¹ Walker v. Luther, 830 F.2d 1208, 1211 (2d Cir. 1987).

²² West Virginia v. EPA, 142 S.Ct. at 2612–13.

²³ *Id.* at 2608.

State of Texas Comments on Docket No. FHWA-2021-004 Page 12 of 13

small entities," and, most incredibly, that "[t]he proposed rule would not have an annual effect on the economy of \$100 million or more. The proposed rule would not adversely affect in a material way the economy, any sector of the economy, productivity, competition, or jobs."²⁴ In fact, FHWA seems to estimate that the financial effect of going net-zero on the NHS to be less than \$13 million.²⁵

The Supreme Court has admonished against such uninformed grabs at regulatory power:

As in *MCI*, we are confident that Congress could not have intended to delegate a decision of such economic and political significance to an agency in so cryptic a fashion. To find that the FDA has the authority to regulate tobacco products, one must not only adopt an extremely strained understanding of "safety" as it is used throughout the Act—a concept central to the FDCA's regulatory scheme—but also ignore the plain implication of Congress' subsequent tobacco-specific legislation.²⁶

As in *FDA v. Brown & Williamson*, the FHWA grabs on to an "extremely strained" understanding of "performance," and is transparently attempting to regulate what Congress did not pass in the IIJA. The fact that Congress considered, but did not pass, a greenhouse gas measure "strongly militates against a judgment that Congress intended a result that it expressly declined to enact."²⁷

²⁴ Proposed 2022 GHG Measure at 42418.

²⁵ Id

²⁶ Food & Drug Admin. v. Brown & Williamson Tobacco Corp., 529 U.S. 120, 160 (2000).

²⁷ Gulf Oil Corp. v. Copp Paving Co., Inc., 419 U.S. 186, 199–200 (1974).

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 1020 of 1050 PageID 4468

State of Texas Comments on Docket No. FHWA-2021-004 Page 13 of 13

Conclusion

In sum, this rulemaking is plainly beyond the scope of the FHWA's statutory authority. For these reasons, as well as the many others raised in TxDOT's comments, the FHWA must withdraw the proposed GHG Measure, either in whole or as it relates to Texas.

Respectfully submitted,

Ken Paxton

KEN PAXTON

Attorney General of Texas

Comments of the Transportation Departments of
Idaho, Montana, North Dakota, South Dakota, and Wyoming
to the
Federal Highway Administration (FHWA)
in Docket No. FHWA-2021-0004
National Performance Management Measures;
Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure
Notice of Proposed Rulemaking
October 9, 2022

The transportation departments of Idaho, Montana, North Dakota, South Dakota and Wyoming ("we" or "our") respectfully submit these joint comments on the Notice of Proposed Rulemaking in this docket, published by the Federal Highway Administration (FHWA) at 87 <u>Federal Register</u> 42401 (July 15, 2022) ("NPRM").

Introduction and Overview.

We oppose the proposal and recommend that it be withdrawn. However, should FHWA proceed to adopt a rule in this docket, we offer important suggestions to improve it.

We also emphasize at the outset that these comments concern the specific rule proposed in this docket. These are not general comments on broad environmental issues. We are working towards a better environment and doing our part. However, we oppose this proposed rule.

The proposed rule would require State Departments of Transportation (DOTs) and Metropolitan Planning Organizations (MPOs) to establish targets for greenhouse gas (GHG) emissions from on-road mobile sources, specifically tailpipe CO2 emissions, on the National Highway System (NHS). Under the proposal, the targets not only would have to be declining targets (i.e., calling for reduced levels of tailpipe CO2 emissions from a reference year, using a metric defined by FHWA in the proposed rule), but "demonstrate reductions toward net-zero targets." The proposal in the NPRM would use as the reference year 2021, a year when economic and transportation activity was held down by the COVID virus, rather than this year or a later year. FHWA signals in the NPRM that penalties could be imposed on States that do not implement the rule per FHWA requirements.

Our key points include the following –

- FHWA lacks the authority to promulgate this rule, and that conclusion was reached by the previous Administration.
- Should FHWA in any event proceed to promulgate a performance measurement and management rule regarding GHG emissions, we would still oppose the rule unless amended to clearly establish that only States (and, to the extent applicable, MPOs) have the authority to set the emissions targets, whether declining, unchanged, or even increasing (such as due to economic growth). Further, if adopted, the rule should be revised to specify that no penalties may be imposed for not meeting a target.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 1022 of 1050 PageID 4470

- We strongly disagree with the proposed use of calendar 2021 as the reference or baseline year for measuring tailpipe CO2 emissions and setting targets, as 2021 tailpipe CO2 emissions levels were reduced due to the COVID pandemic.
- We also disagree generally with the approach of the rule as States, particularly very rural States such as ours, have little ability to influence tailpipe CO2emissions for multiple reasons. Among them, some States have restrictions on the use of State highway funds, requiring them to be used exclusively for maintenance, construction and supervision of highways and bridges.
- In his September 14 appearance before the Senate Environment and Public Works Committee, the nominee for FHWA Administrator, Shailen Bhatt, indicated general recognition that sometimes one size does not fit all. The proposed rule would be greatly improved by exemptions for very rural States (which have few if any options for actions to reduce tailpipe CO2 emissions) and for rural very low-income States (which are hard pressed to use scarce dollars on any but the State's highest priority transportation investments).

Before discussing those and other points, we note some background.

On January 18, 2017, FHWA published a final rule that, among other things, established a performance measure on the percentage change in CO2 emissions from 2017 (as a reference year) generated by on-road mobile sources on the NHS, as well as related requirements that States establish and meet targets relative to that GHG measure. 82 Federal Register 5970. Early in the last Administration, FHWA published a proposed rule to repeal those GHG performance measurement and management requirements. 82 Federal Register 46427 (October 5, 2017). On May 31, 2018 the last Administration did adopt a rule that repealed the January 18, 2017 rule, and found that the 2017 rule was beyond FHWA's statutory authority¹ while also identifying policy concerns with the rule that it repealed. 83 Federal Register at 24920. The proposal in this docket would, in essence, reinstitute the problematic CO2 performance measurement and management rule that the previous Administration repealed but make it more problematic by greatly undermining State authority to set targets -- by requiring States to set declining (toward net-zero) targets for on-road CO2 emissions on the NHS.

The GHG Performance Management Requirement is Without Statutory Authority.

In the statutory provision authorizing performance measurement and management, 23 USC 150, paragraph 23 USC 150(c)(2) states that USDOT shall "<u>limit performance measures only to those described in this subsection.</u>" (Emphasis supplied).

There is no express mention of a GHG or CO2 performance measure in 23 USC 150(c). Nor is there other language in the subsection that "describes" a GHG measure.

¹ FHWA wrote in 2018: "... there is no explicit reference to a GHG measure in 23 U.S.C. 150(c). Thus, adoption of a GHG measure rested entirely on FHWA's discretion to interpret 23 U.S.C. 150(c). As discussed in the legal authority section in Section IV.B.1, FHWA has concluded, upon reconsideration, that the better reading of the statute does not encompass the GHG measure." 83 <u>Federal Register</u> at 24932.

2

There is, however, express direction to USDOT by Congress to establish measures to "assess ... on-road mobile source emissions" in 23 USC 150(c)(5) "for the purpose of carrying out [23 USC] section 149." 23 USC 149 authorizes the Congestion Mitigation and Air Quality (CMAQ) program, an element of the Federal highway program. The CMAQ program concerns actions with respect to a specific list of pollutants that does <u>not</u> include GHG (CO2). So, while Congress acted in paragraph 150(c)(5) to require establishment of performance measures for some on-road mobile emissions, that section is not a basis of authority for a GHG performance measurement and management requirement.

In any event, under both the pending NPRM and the rule developed two Administrations ago (and subsequently repealed), FHWA advises that the basis for the tailpipe CO2 emissions performance measurement and management requirement was not 23 USC 150(c)(5), but 23 USC 150(c)(3). See NPRM at 87 Federal Register 42407 and 82 Federal Register at 46431 (2017).

There is nothing in 23 USC 150(c)(3), either, that could fairly be considered to have "described" a GHG performance measurement and management system for GHG (CO2). The words "greenhouse gas," "GHG," "CO2," "carbon dioxide," and "emissions" do not appear in the provision. Nor is there a sentence or phrase in paragraph (c)(3) describing a GHG performance measure or regulation.

23 USC 150(c)(3), claimed as the statutory basis for the proposed rule, concerns establishing certain listed standards "for the purpose of carrying out section 119 [of title 23]." Similarly, the words "greenhouse gas," "GHG," "CO2," "carbon dioxide," and "emissions" do not appear in 23 USC 119. To the extent that FHWA's interpretation is that a GHG measure is authorized by the very general reference in paragraph (c)(3) to measures for the "performance" of the Interstate System and the rest of the NHS, the interpretation is far removed from either a description specifically listing GHG as a topic for performance measurement and management or a less specific statement that would "describe" GHG as a permissible subject of a performance measure.

FHWA then tries to overcome the lack of a description in "subsection" 150(c), by referring to general national goals for the highway program set forth in 23 USC 150(b). But while Congress made clear in statute that authorization for a performance measure requires that the measure be "described in this <u>subsection</u>" (referring to subsection (c)), subsection (b), relied on by FHWA to supply the description that does not appear in subsection (c), in any event does not contain any reference to GHG or CO2 measures. So, FHWA notes that "environmental sustainability" is a goal in subsection (b) and, from that, concludes that means that the reference to "performance" in subsection (c)(3) meets the test of a tailpipe CO2 emissions reduction measure being described in subsection 150(c). Under such an approach 23 USC 150(c)(3) would appear to be a source of vast authority for regulation, whether of CO2 emissions or other factors not described in its text. This is contrary to the clear directive in 23 USC 150(c)(2) that USDOT shall "limit performance measures only to those described in this subsection." (Emphasis supplied).

And interpretations of subsection (b) are readily available that do not obliterate the requirement that a performance measure be described in subsection (c). Implementing paragraph (c)(5), for example, to assess on road mobile sources for the purposes of the CMAQ program, is consistent

with the "environmental sustainability" goal of subsection (b). The goals subsection is not a directive to rewrite subsection (c).

Further, a general rule in aid of statutory construction is that "the specific governs the general." See Morales v. Trans World Airlines, 504 U.S. 374, 384 (1992). Within 23 USC 150(c), paragraph (5) is the provision concerned with "on-road mobile source emissions" and congestion. Rather than respect that Congress had specifically addressed performance measures for emissions in paragraph (c)(5), the NPRM concludes that a very general reference to "performance" plus language not in subsection 150(c) is sufficient to justify measures regarding emissions (GHG) that are beyond the scope of paragraph (c)(5). The more logical approach, consistent with statutory construction rules, would be to conclude that, within subsection 150(c), Congress expressly stated how to address emissions in paragraph 150(c)(5) and that, particularly given the absence of any other "description" in subsection 150(c) of emissions regulation, the rest of subsection 150(c) -- including paragraph (c)(3) -- did not provide other authority to regulate emissions, including CO2 emissions.

In addition, importantly, an interpretation that results in regulatory power in USDOT to expand the set of performance measures is <u>contrary to</u>, not <u>merely in addition to</u>, other words that Congress included in 23 USC 150(c). As noted, in subsection 150(c) Congress stated that FHWA shall "<u>limit performance measures only</u> to those <u>described</u> in this <u>subsection</u>." 23 USC 150(c)(2)(C) (emphasis added).

Those are four words of limitation in one sentence! And they must be given weight. The words "limit" and "only" do not allow, much less encourage an expansive reading of the authority provided to promulgate performance management rules. They direct a limited, narrow reading of measures authorized by subsection 150(c). Nor does any word or phrase in <u>subsection</u> 150(c) "describe" a GHG performance measure. FHWA went looking in subsection (b) for a description while Congress specified the text of subsection (c) as the frame of reference, not the full statute or any other subsection.

Congress' reference to the subject of performance measures being "described" in subsection 150(c) cannot be treated as surplusage or as without meaning. In short, a GHG (CO2) measure is **not** "described" in 23 USC 150 subsection (c), either in paragraph (3) or elsewhere, which is a prerequisite for a performance measure under section 150.

The legislative history of 23 USC 150 supports the conclusion that the proposed rule is not authorized. The section was enacted as part of "MAP-21," Pub. L. No. 112-141 (2012). The Conference Report for MAP-21 described 23 USC 150, which has not been substantively modified since enactment, as follows:

"Performance measures

"The nation's surface transportation programs have not provided sufficient accountability for how tax dollars are being spent on transportation projects and would benefit from a greater focus on key national priorities. The conference report focuses the highway program on key outcomes, such as reducing fatalities, improving road and bridge

conditions, reducing congestion, increasing system reliability, and improving freight movement and economic vitality."

H. Conf. Rep. No. 112-557, to accompany H.R. 4378, at 598 (2012).

While the conference report does say that the listed "key outcomes" from the performance measures program are "such as," it is conspicuous that there is no suggestion whatsoever of a GHG performance measure with targets to reduce CO2 emissions. Conference report language has always been viewed as critically important legislative history and the conference report language describing the performance measures the Congress authorized is fully consistent with the lack of authorization for a GHG performance measure. Simply, the Conference Report on what became MAP-21 was the opportunity for the Congress to explain what measures were "described" in subsection 150(c) and nothing resembling a GHG or CO2 performance measure was described.

For at least all of the above reasons, FHWA should not adopt the proposed rule. It is beyond the agency's authority as it does not meet the essential statutory test of setting forth a performance measure "described" in 23 USC 150(c).

Even if one were to believe there is arguably authority for the proposed rule, the Supreme Court recently reaffirmed that there must be "clear" authority for promulgation of a rule on a "major question." The proposal to regulate States to reduce GHG emissions would represent a major change in a major program, the highway program, without clear authority; so, there is not authority for the proposed rule.

In <u>West Virginia v. EPA</u>, 597 U.S. ___ (2022), 142 S. Ct. 2587, the Court recently applied the "major questions doctrine" to its review of a rule promulgated by the U. S. Environmental Protection Agency (EPA). The Court explained that an agency must point to "clear congressional authorization" for the authority it claims in cases where the "breadth" of the authority claimed and the "economic and political significance" of the asserted authority provide "reason to hesitate before concluding that Congress meant to confer such authority." <u>Id</u>. (slip opinion) at 17 (quotation marks and citations omitted).

Under the proposed rule, FHWA would be able to influence the selection of projects by States that rely on formula funds that Congress requires FHWA to distribute to the States. This would be a major change from today's norm, where formula funds are distributed to States, with States selecting projects to execute with those funds pursuant to parameters set forth by Congress. If the proposed rule were adopted, a State would be faced with pressure to select projects based on whether they would help the State achieve a "declining target" for CO2 emissions – or face potential penalties.³

-

² <u>Id</u>. (slip opinion) at 19 (quotations and citations omitted).

³ While the proposed rule itself does not propose penalty authority or levels, both the NPRM and the Economic Assessment for the proposed rule volunteer that FHWA has penalty authority elsewhere that could be applied. See NPRM at n.39, 87 <u>Federal Register</u> 42415, and the Economic Assessment at 9.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 1026 of 1050 PageID 4474

In the FHWA's draft "Summary Report – Economic Assessment for Greenhouse Gas Performance Measure," June 2022 ("Economic Assessment," available in the docket for the NPRM), FHWA states "it is not possible to conclude with any degree of certainty whether and how the [proposed] GHG measure might cause State DOTs and MPOs to make transportation investment and operations decisions that they otherwise would not have made." <u>Id</u>. at 6.

Later on, the Economic Assessment acknowledges that "the rule may result in some offsetting loss of benefits from investment projects that would no longer be pursued, if funds are shifted towards other projects as a result of the rule." Id. at 29.

We are concerned that FHWA's Economic Assessment understates the consequences and the considerable pressure that a State could face under the proposed rule. In particular, all States strive to achieve economic growth and, historically, that is associated with an increase in vehicle miles traveled, which tends to generate increased CO2 emissions. To achieve a reduction in CO2 emissions during hoped-for long periods of substantial economic growth will be challenging at best, particularly in States where electric vehicle deployment may be slow.

Further, in rural States per person vehicle miles traveled (VMT) are generally higher than average, we suggest due to absence of congestion. Relatively dispersed populations in rural States have to travel longer distances to and from destinations for basic needs such as shopping and health services. Also contributing to high VMT per person in rural States are the long distances agricultural products and natural resources travel from rural points of origin on their way to national and world markets.

FHWA provides in the proposed rule that a State must meet a "declining" target for CO2 tailpipe emissions (measured against the baseline for that State under the particular way that FHWA would calculate CO2 emissions under the proposed rule). The proposed rule goes even further, specifying that the declining target must "demonstrate reductions toward net-zero targets." Proposed 23 CFR 490.105€ (10), NPRM at 42419-20. Thus, it appears foreseeable that FHWA could, under this proposed rule, pressure States that fail to hit aggressive targets for tailpipe CO2 emissions reduction to adjust the mix of projects selected for action with the State's limited Federal formula funds − or face penalties, perhaps including non-approval of projects selected by the State that otherwise would be approved.

We also believe FHWA has significantly underestimated the costs of implementing this major rulemaking in terms of time and resources and opportunity costs associated with implementation of the rule. States may well be discouraged from making investments that they prefer in order to pursue projects to achieve "declining" tailpipe CO2 emissions. The benefits of such other projects are important – such as safety, connectivity and efficiency – and the proposed rule appears likely to discourage or delay at least some other projects and their benefits.⁴

_

⁴ See pages 8-10, <u>infra</u>, for additional discussion of reasons why the proposed rule would have a major impact on the ability of States to function under the Federal highway program. Those reasons apply not only to the appropriateness of invoking the major questions doctrine, but the inappropriateness of the proposed rule's unprecedented limitations on the authority of States to set targets with respect to a performance measure and the overall inappropriateness of applying the rule to rural States. See also discussion at page 6, <u>infra</u>, where the Economic Assessment for the NPRM recognizes that the impact on project selection by States would result in the loss of benefits from projects that are delayed or canceled due to the proposed rule.

In addition, since Congress authorized the Interstate Highway System in 1956, the Federal highway program has given considerable emphasis to major arterial roads. Those are the Interstate System highways and other highways on the National Highway System that tie the country together and enable long distance movement of people and freight. The proposed rule would have a State focus its tailpipe CO2 emissions reduction efforts on Interstate System and NHS roads, the roads that carry the overwhelming majority of through interstate traffic, even though transferring highway funds to transit projects will not reduce through interstate traffic, but at most only some local traffic that uses NHS routes.

Moreover, rural States are at a disadvantage under the proposed rule in pursuing targeted reductions of CO2 emissions due to the absence of congestion. The calculations under the proposed rule for estimating CO2 emissions is purely a function of relationship of NHS to non-NHS VMT and fuel consumption (to which an emissions factor is applied). In densely populated States where there is congestion, there may well be opportunities to reduce CO2 emissions through transit investment. However, absent congestion, the opportunity in rural States to reduce VMT or fuel consumption is extremely limited.

Further, and importantly with respect to the principles of West Virginia v. EPA, authorization for a GHG performance measure was debated and not included in 2021's Infrastructure Investment and Jobs Act (IIJA), H.R. 3684, enacted as Pub. L. No. 117-58, or in 2022's budget reconciliation legislation, known as the Inflation Reduction Act, H.R. 5376, enacted as Pub. L. No. 117-169. The House of Representatives passed H.R. 3684 on July 1, 2021. Express authority for GHG performance measures and targets was set forth in section 1403, but not agreed to by the Senate and not included in the law. Additionally, the House passed budget reconciliation legislation, H.R. 5376, on November 19, 2021; section 110002 of that bill included express authority for GHG performance measures and targets. Again, such authority was not agreed to by the Senate and not included in the law.

Instead, Congress addressed greenhouse gas in other ways, enacting in IIJA new programs with funding, for example, a carbon reduction program (\$6.4 billion over 5 years) and investments in charging stations for electric vehicles (over 5 years \$5 billion in formula funds and \$2.5 billion in discretionary funds). Yet, FHWA claims authority from the 2012 legislation (MAP-21) that created the FHWA performance management program, and that legislation does not include any of the specific language that proponents of a GHG performance measurement and management system so recently sought to enact.

This is extraordinarily similar to the fact pattern before the Court in West Virginia v. EPA. There, the Court noted that Congress had considered and rejected the type of system of power plant regulation that EPA nonetheless promulgated and was before the Court. See West Virginia v. EPA, slip opinion at 27-30. The Court concluded that the Congressional rejection of the regulatory scheme that EPA proceeded to promulgate was an indication that EPA must point to "clear congressional authorization to regulate in that manner." Id. at 28 (quotation marks and citations omitted).

_

⁵ In addition, at least one amendment was filed during Senate floor consideration of the bill that would have established a GHG performance measure, but it did not receive floor action. S. Amendment 2465, Sen. Cardin, Cong. Rec., August 3, 2021 (daily ed. at 5786).

We set forth above numerous reasons why the proposed rule is not authorized. Those same reasons also contribute to a conclusion, if needed, that the proposed rule is not grounded in "clear" authorization.

Further, as noted above (page 2, <u>infra</u>) the prior Administration closely considered the question of whether FHWA has authority for the proposed GHG performance measure rule and concluded that it does not. For the purposes of the major questions doctrine, the prior Administration's view that there is not authority for the proposed rule is a very strong indication that there is not the requisite "clear" statutory authority for such a major change in policy for the highway program.

Accordingly, in addition to other reasons advanced herein, FHWA should not adopt the proposed rule because it is not authorized under the major questions doctrine.

Should FHWA adopt a rule in this docket, it should first modify the proposed rule in important ways.

If FHWA nonetheless decides to impose tailpipe CO2 emissions performance measurement and management requirements, that does not mean that it should do so as it proposes, as discussed below.

<u>Target Setting Must be Reserved Solely to States, particularly as it is Challenging at Best for a State to Directly Impact Tailpipe CO2 Emissions.</u>

The performance measurement statute is clear that it is a "State" that sets targets for performance, not FHWA. 23 USC 150(d) provides –

"...after the Secretary has promulgated the final rulemaking under subsection (c), <u>each</u> <u>State</u> shall set performance targets that reflect the measures identified ..." (emphasis supplied).

Under the proposed rule, however, FHWA specifies that the targets must be "declining targets for reducing tailpipe CO2 emissions on the NHS, that demonstrate reductions toward net zero targets." Proposed 23 CFR 490.105(e)(10). 87 Federal Register 42419-20.

This proposal effectively leaves a State (or, as applicable, an MPO) with very little choice in setting targets; FHWA is really setting the targets.

FHWA's rulemaking approach stands in contrast to performance measurement and target setting under a program of grants to States administered by a different USDOT agency, the National Highway Traffic Safety Administration. In Section 24102 of the IIJA, Congress amended aspects of performance measurement and targeting for the purposes of NHTSA programs of grants to States, effective with fiscal year 2024.

Section 24102 struck a reference in statute to States setting "annual performance targets" and inserted instead "performance targets that demonstrate constant or improved performance". 135 STAT 789.

So, when Congress wanted to require States to set targets for constant or improved performance, and not allow targets for declining performance, it knew how to do so. It did not do that for FHWA performance measurement under 23 USC 150. Yet, FHWA asserts in this NPRM authority to require declining CO2 emissions (improved GHG performance) and further greatly narrow the State's discretion by specifying that the State's targets must demonstrate progress towards "net zero." This is contrary to the straightforward statutory language that "each State shall set performance targets."

The top-down approach to target setting proposed in the NPRM also greatly impinges on the ability of a State to take into account, in target setting for the State, any State specific circumstances. What if the State is experiencing significant population growth? Significant economic growth? Both? What if, as is the case for many States, there are State constitutional restrictions on the use of highway revenues for non-highway purposes, limiting the prospects of using highway funding for a transit investment?

In addition, in States like ours, residents drive longer than average distances for basic goods and services, often in challenging weather. Cold weather and high elevation adversely impact the effectiveness of at least some electric vehicles (EVs). In our States, cold weather and high elevation may discourage purchases of electric vehicles (EVs). State target setting could take that into account. These and other factors can receive at most marginal weight under the proposed rule because FHWA has dictated the general nature of the target that must be set.

Moreover, the NPRM does not appear to recognize the potential dislocation to State transportation programs from the rule. Today, most highway projects advanced by State DOTs are in the nature of system preservation (resurfacing, etc.). Such projects do not add capacity or induce any demand; nor does a decision to not undertake resurfacing result in any meaningful shift of mobility to transit or walking from passenger cars. Moreover, failure to preserve pavement may well increase GHG emissions as rough pavement tends to reduce travel speeds (increasing per trip emissions). For such reasons, it is speculative and not demonstrated that States have the ability to effect meaningful change in GHG emissions through stewardship of the highway program. The GHG rule effectively looks for GHG reductions from a largely preservation-oriented highway program, where they are not available to be had. So, the rule would place pressure on a State to change the mix of projects, for speculative if any benefit.

We also note that, under another statutory regime, USDOT, through NHTSA, addresses the fuel economy of various vehicles. Vehicles (excluding EVs) and fleets of them regulated by NHTSA do produce direct CO2 emissions when operating, while States and others that own and operate the roads are not emitters in their capacity as owners or operators. Further, the three main components of the proposed GHG emissions performance metric are fuel sales, fuel efficiency factors, and vehicle miles traveled. State DOTs are generally non-regulatory agencies and have limited ability to change those variables.

As a result, a requirement to reduce CO2 emissions, imposed on States, would place pressure on States to adjust project selection. That will represent a major change in the nature of the program of Federal assistance to States for highways, where State authority and flexibility to prioritize projects has been a bedrock principle.

For the reasons set forth above, if a rule is promulgated in this docket, proposed 23 CFR 490.105(e)(10) must be revised to delete both the specification that targets must be "declining" and the specification that targets must "demonstrate reductions toward net-zero targets." The revision must not include any other specification as to what the target must do. Instead, the final rule must expressly establish that "only" the State (or if applicable, an MPO) sets targets and must also expressly allow a "State" the authority to set targets for the measure, in this case tailpipe CO2 emissions on the NHS, "whether constant, declining, or increasing."

States Face Great Difficulty in Efforts to Impact CO2 Emissions Levels; That Difficulty is Particularly Acute for Certain Rural States, Which Should be Exempted from the Requirements of the Proposed Rule.

Rural States may face particular challenges and program distortions under the rule as it is hard for States to influence the factors that form the proposed measurement metric, such as level of VMT, or fleet fuel economy. A review of the January 18, 2017, Federal Register notice that promulgated the GHG measurement and management rule as a final rule offers ideas from that time period by FHWA as to how States might influence a decrease in GHG emissions. See 82 Federal Register at 5997. Many of those ideas -- congestion pricing, road pricing, ramp metering, increased coordination with transit and non-motorized improvements, paying fees to scrap low mileage heavy duty vehicles – may be options for heavily populated metropolitan areas. The current NPRM notes the possibility that transit investment could help reduce CO2. NPRM at 42410. But these and similar actions are not well suited to rural settings, where residents drive relatively long distances, often in heavy duty vehicles required for business or agriculture and able to maneuver effectively in inclement weather and through altitude changes. Further, low population densities greatly limit, if not eliminate good transit options for investment. Further, Congress, in the IIJA already greatly increased transit program funding levels.

In any event the transit example noted in the NPRM is really geared to denser populations. FHWA states:

For instance, the construction of a new grade-separated transit facility has the potential to reduce travel on neighboring roadways, which in turn would reduce congestion, improve safety, and reduce criteria pollutant emissions in addition to reducing on-road GHG emissions. NPRM at 42410.

A "grade-separated transit facility" is a high-volume transit facility, not a bus operating on a route in mixed traffic with passenger cars. So, as was the case in the Federal Register notice of January 18, 2017, references to transit in a Federal Register notice concerning a tailpipe CO2 emissions performance measure do not speak to an option likely to be available in the setting of a rural State.

Accordingly, if FHWA should proceed to adopt a final rule in this docket, that final rule should

Be expressly inapplicable to very rural States, we would define them as having a population per square mile of land area of 30 or fewer, and other States with population density below the national average that are also among the five lowest per capita income States. These States may not be as rural but, with low per capita income, are especially pressed to focus their highway and transportation funds on the highest priority transportation projects.

Should a rule be promulgated, such limited (but highly meritorious) exemptions would still include within the rule the vast majority of States and an even higher proportion of the population.

No Penalties.

As noted above at note 4, FHWA has stated that it could use other rules as a basis for imposing penalties on States that do not meet the declining targets largely dictated by FHWA. Imposition of penalties would be, to our knowledge, contrary to practice under the performance management program. To date, when a State does not meet a target that it has set (for a measure adopted by FHWA), the result is consultation with FHWA and new target setting and efforts to meet the new target. Let us be clear, while not a penalty, such "consultation" gives FHWA an opportunity to press States, including to adjust the State's program of projects in pursuit of reduced CO2 emissions. The voluntary mention by FHWA of the possibility of penalties injects much more pressure for States into any such consultations. Further, penalties are particularly inappropriate as applied to this proposed rule because, as explained above, States have little opportunity to take actions that can impact the measurements.

Accordingly, if the proposed rule is to be finalized at all, a new section should be added to part 490 to specify that that "no penalty may be imposed for failure to meet a target [under the tailpipe GHG/CO2 emissions performance measure]."

The Proposed Use of Calendar Year 2021 as the Reference Year for Measurement under the Proposed Rule Should be Changed to 2022 or an Even Later Year.

It is axiomatic that a rule intended to spur States to reduce CO2 tailpipe emissions must have a reference year against which future emissions levels will be measured, to see if there is a reduction or other change. The proposed rule would use calendar 2021 as the reference year as, per FHWA, it is the most recent year for which FHWA will have data. See NPRM at 42415.

2021, however, was a year when economic and transportation activity was held down by the COVID virus and response to it, even though we now approach the end of 2022, a year expected to reflect an increase in VMT compared to 2021. Thus, from the outset, the proposed rule would make it even more difficult for States to achieve a declining target.

In contrast, this was not an issue under the rule promulgated on January 18, 2017, two Administrations ago. That rule set 2017, not an earlier year, as the baseline year. 82 Federal Register 5970. In that proposal, FHWA, consciously or not, recognized the inappropriateness of using, as a reference year, a year with lower emissions than the then current year.

In short, if there is a final rule in this docket, the reference year should <u>not</u> be 2021 or any other year that represents an unusually low level of VMT (and therefore of tailpipe CO2 emissions) but 2022 or an even later year.

No Retroactive Requirements.

The NPRM is clear that the comment deadline on the proposal is October 13, 2022. Yet the proposed revisions to 23 CFR 490.105 and 490.107 would establish an October 1, 2022 "reporting date" for information as to the proposed GHG rule, including targets. NPRM at 42412 and 42419. This proposed retroactive provision is perhaps inadvertent and clearly untenable.

If there is to be a final rule in this docket, the reporting dates for the new requirements should begin at least two years later than currently proposed, i.e., no earlier than October 1, 2024, to allow States to begin to implement the new provision before reporting on it.

Limit Definition of GHG to What is at Issue, CO2.

As the operative provision in the proposed rule is a measurement and targets for tailpipe CO2 emissions, we were surprised that the definition of "greenhouse gas (GHG)" at proposed 23 CFR 490.505 is broader than that. The definition also includes methane, nitrous oxides and unspecified hydrofluorocarbons. The definition further includes the statement that "97 percent of the on-road GHG emissions are CO2." NPRM at 42421 and 42415.

We do not discern (so far) that the proposed rule's inclusion of emissions other than CO2 in the definition of GHG establishes regulatory requirements as to those other emissions, but don't dismiss the possibility that FHWA may see authority as a result of including those additional gases in the definition, something that it has not explained in the NPRM. The point is that inclusion in the definition of these other emissions is unnecessary to effectuate a proposal to limit tailpipe CO2 emissions, which FHWA says represents 97 percent of the tailpipe GHG emissions. This overbroad definition seemingly opens the door to more regulation without even a rulemaking, as FHWA conceivably could issue guidance or an interpretation purporting to apply operative requirements with respect to these other than CO2 emissions – as they would already be in the rule as part of the term "GHG."

The reference to 97 percent is a reason why, if one were to support a GHG performance measurement and management rule, which we do not, it would focus on CO2. It is not a reason to include the sources of the other 3 percent in the definition. It is, to the contrary, a reason to exclude those other gases from the definition. If FHWA should later consider that it wants to regulate with respect to those other emissions, it can begin a new rulemaking and address issues as to its authority and reasons for the proposal at that time.

Case 5:23-cv-00304-H Document 15-20 Filed 01/31/24 Page 1033 of 1050 PageID 4481

Accordingly, if there is to be a final rule in this docket, the definition of "greenhouse gas (GHG)" should be revised to refer solely to tailpipe CO2 emissions.

Conclusion.

The transportation departments of Idaho, Montana, North Dakota, South Dakota and Wyoming oppose the proposed rule to establish GHG performance measurement and management requirements. We do not believe there is authority for FHWA to promulgate such a rule. We also have explained above policy objections to such a rule, which will be especially problematic for rural States.

If, notwithstanding our objections, the rule is to be promulgated, revisions should be made, particularly to restore the exclusive State role in setting targets, and to exempt from coverage under the rule very rural States and certain States that are rural and have very low per capita income from coverage. Additional changes that we have recommended, such as changing the inappropriate proposed 2021 reference year for measurement, are also highly meritorious and should be incorporated if the rule is to be finalized.

The transportation departments of Idaho, Montana, North Dakota, South Dakota and Wyoming thank FHWA for its consideration and recommend that any further action on the issues addressed in these comments be in accord with these comments.

125 EAST 11TH STREET, AUSTIN, TEXAS 78701-2483 | 512.463.8588 | WWW.TXDOT.GOV

October 12, 2022

Ms. Stephanie Pollack, Acting Administrator Federal Highway Administration, U.S. Department of Transportation 1200 New Jersey Avenue SE Washington, DC 20590

Re: Docket No. FHWA-2021-0004

Dear Ms. Pollack,

I am writing to provide the Texas Department of Transportation's (TxDOT's) comments on the above-referenced notice of proposed rulemaking (NPRM) that was published by the Federal Highway Administration (FHWA) in the Federal Register (FR) on July 15, 2022 (Docket No. FHWA-2021-0004). In the NPRM, FHWA proposes to amend its national performance management measures at 23 CFR Part 490 to require State departments of transportation (State DOTs) and metropolitan planning organizations (MPOs) to (1) establish declining targets for reducing tailpipe carbon dioxide (CO₂) emissions on the National Highway System (NHS), and (2) submit reports to FHWA on tailpipe CO₂ emissions on both the NHS and all public roads.

TxDOT does not oppose efforts designed to reduce greenhouse gases (GHG), and in fact has several activities, programs, and funding initiatives that have the effect of reducing GHG.¹ However, TxDOT has multiple concerns with the NPRM, as outlined in the following pages.

TxDOT appreciates the opportunity to comment. If you have any questions, please call me at (512) 305-9515 or you or your staff may contact Melanie Alvord, Director, Federal Affairs Section at Melanie. Alvord@txdot.gov or at (512) 944-5135.

Sincerely.

Marc D. Williams, P.E. Executive Director

cc: Lance W. Simmons, P.E., Chief Engineer, TxDOT

Brian R. Barth, P.E., Deputy Executive Director for Program Delivery, TxDOT

Doug Booher, Environmental Affairs Division Director, TxDOT

¹ Examples include TxDOT's Recycling and Clean Construction and Operation Program; provision of approximately \$232 million per year in nonattainment areas for federally funded Congestion Mitigation Air Quality (CMAQ) improvement projects (e.g., bicycle and pedestrian facilities); TxDOT planning and designing for bicycles and pedestrian funding programs, including approximately \$172 million per year in transportation alternatives projects and \$20 million per year in pedestrian mobility, accessibility, and safety projects; greening the TxDOT fleet with electric vehicles and alternative-fueled vehicles; and TxDOT's Clean Air Plan, which encourages over 11,000 employees statewide to reduce vehicle emissions.

2

October 12, 2022

First, Congress has not directed or authorized FHWA to establish tailpipe CO_2 performance measures for the NHS. While there are certain measures that State DOTs and MPOs are taking that have the effect of mitigating the amount of CO_2 emissions associated with transportation (such as promoting alternatives to single-occupancy vehicle travel, such as rail, transit, high-occupancy vehicle lanes, etc.), State DOTs and MPOs simply have no legal authority over the amount of GHGs emitted from the tailpipes of vehicles traveling on the NHS on a per-vehicle basis. Therefore, the ability of State DOTs and MPOs to achieve the declining targets for reducing tailpipe CO_2 emissions on the NHS is severely limited. Any strategy that would involve deliberately ratcheting-down the number of vehicles that can safely and efficiently travel via the NHS, or rationing the use of highways by the public, would run contrary to the State DOTs' legislative mandates to facilitate transportation and reduce congestion, and could have substantial negative effects on the economy and other aspects of public life. Of particular concern is the FHWA's stated expectation that State DOTs' and MPOs' declining targets for CO_2 emissions align with the current Administration's targets of an overall 50-52% reduction in emissions from 2005 levels by 2030 and net-zero emissions economy-wide by 2050. Such reductions are not achievable without diverting from the intent of the NHS.

Regarding timing, the proposed rule would require State DOTs to include targets for the proposed CO₂ performance measure in their State Biennial Performance Report due to FHWA by October 1, 2022; however, the comment period on the NPRM closes after this date, on October 13, 2022. While the NPRM recognizes that the date for States to report State DOT initial targets for the proposed CO₂ performance measures may need to be adjusted and requests comment on what the due date should be in the event a final rule is not effective by October 1, 2022, TxDOT is concerned that the failure of FHWA to recognize that the deadline for State reporting falls nearly two weeks before the comment period closes on the proposed NPRM is indicative of FHWA's intent to finalize the action proposed in the NPRM without fully considering public comments.

In the comments below, TxDOT has elaborated on these and other concerns with the proposed rulemaking. TxDOT appreciates your consideration of its comments.

Comment 1: Congress has not, in fact, directed or authorized FHWA to establish a CO₂ performance measure for the NHS; therefore, the proposed rule constitutes impermissible overreach by an administrative agency.

FHWA cites 23 USC §150(c) as the source of its authority to establish CO₂ performance measures.² Section 150(c) requires the U.S. Department of Transportation (USDOT) to establish performance measures and standards for four specific programs: (1) the national highway performance program, (2) the highway safety improvement program, (3) the congestion mitigation and air quality program, and (4) national freight movement. In MAP-21, Congress specifically set boundaries on USDOT's authority to establish performance measures under §150(c), stating that USDOT "shall ... limit performance measures only to those described in this subsection." 23 USC §150(c)(2)(C).

According to the NPRM, FHWA's authority to establish a CO_2 performance measure is embedded in the statutory description of the "national highway performance program" at 23 USC §150(c)(3). Specifically, FHWA finds its authority in the statutory requirement to establish measures for the States to assess "the performance of the Interstate System" and "the performance of the national highway system (excluding the interstate system)." 23 USC §150(c)(3)(A)(ii)(IV) & (V). These

_

² 23 USC §150(c) was enacted ten years ago in 2012 as part of MAP-21.

October 12, 2022

provisions neither mention CO_2 emissions nor use language that would reasonably be viewed as "describing" CO_2 emission considerations.

3

Despite the absence of any explicit Congressional instruction regarding a CO₂ performance measure, FHWA claims its authority is implied in subsections (IV) and (V) because a *different* subsection, §150(b), "national goals," refers to a general national goal of "environmental sustainability." 23 USC §150(b)(6). Importantly, however, the national goal of "environmental sustainability" does not mention GHG. Further, there is a difference between a statement of general policy or "national goal," and a statutorily required "performance measure" that is directly applicable to State DOTs' and MPOs' management of the NHS. In fact, Congress separated the "national goals" and "performance measures" in two different subsections, §§150(b) and (c), with neither referencing the other.

Despite the clear distinction in the statute, FHWA nevertheless attempts to link the "environmental sustainability" national goal in §150(b) to the statutorily required performance measures set forth in §150(c)(3)(A)(ii)(IV) and (V) by stating that the CO_2 performance measure is consistent with other parts of Title 23, notably 23 USC §119. FHWA notes that §150(c)(3)(A) (regarding the performance measures) states that establishment of the national highway performance program is "for the purpose of carrying out section 119." Section 119 requires, among other things, that State DOTs develop "state asset management plan[s]," to "make progress toward achievement" of state targets and performance pursuant to §150(d) and supporting progress toward achieving the national goals identified in §150(b). 23 USC §119(e)(2). In essence, the NPRM appears to suggest that to know the true meaning of §150(c)(3)(A)(ii)(IV) and (V), one must look to an entirely different section, §119, and specifically the discussion of "state asset management plans" in §119 (which are different than statutorily required performance measures), and then, in accordance with §119, one must look back yet again to the national goals identified in §150(b). TxDOT does not believe that this approach to statutory interpretation was Congress's intent.

FHWA also cites four other statutory provisions in support of its authority to take the proposed action. These provisions include: 23 USC $\S101(b)(3)(G)$ (transportation policy), $\S134(a)(1)$ (transportation planning policy), $\S134(c)(1)$ (metropolitan planning), and $\S\S135(d)(1)$ and (d)(2) (statewide planning process and a performance-based approach). However, none of these provisions mention CO_2 emissions or further define the statutorily required performance measures at $\S150(c)$. FHWA's piecing together bits of vague statutory language from different statutory sections and subsections is does not provide clear instruction that there should be a CO_2 performance measure for the NHS, and cannot overcome Congress's unambiguous statement in 23 USC $\S150(c)(2)(C)$ that USDOT "shall ... limit performance measures only to those described in this subsection." As noted above, Congress had the opportunity to require consideration of CO_2 emissions when it adopted MAP-21 or subsequent statutes and did not do so.

It is worth noting that the legislative history of MAP-21 provides no indication of Congressional intent to require analysis or consideration of GHGs in connection with performance measures. Indeed, there does not appear to have been discussion of the topic in either House or Senate deliberations relative to the same, and neither §150(c) nor MAP-21 generally direct FHWA to establish GHG measurement requirements.

On November 15, 2021, the Infrastructure Investment and Jobs Act (IIJA) was signed in to law (Public Law 117-58). The IIJA contained dozens of references to GHG emissions, and carbon emissions specifically, and created several new programs aimed at GHG emissions, such as new grant programs and programs related to carbon capture and sequestration. Subtitle D of Title I of the IIJA

OUR VALUES: People • Accountability • Trust • Honesty
OUR MISSION: Connecting You With Texas

4

October 12, 2022

primarily focused on climate change and created new §175 to Title 23, which provides for a carbon reduction program that funds a variety of measures to reduce carbon emissions. However, nothing in this section or elsewhere in the IIJA links these measures to the performance management programs referenced in §150 or §119. Given that the IIJA made extensive revisions to many of the laws governing the Federal Aid Highway Program and devoted significant focus on issues related to climate change, it is telling that Congress had a recent and specific opportunity to revise §150 to require a CO_2 performance measure for the NHS, but did not.

A Federal agency's inability to establish GHG regulations in the absence of a clear Congressional directive has been well-established in case law, most notably in the U.S. Supreme Court's decisions in *Utility Air Regulatory Group v. EPA* (2014) and in *West Virginia v. EPA* (2022). For further explanation of the relevant case law, please see the comments submitted on the NPRM by the Texas Attorney General's Office.

Comment 2: Even if Congress had called for a CO₂ performance measure, it would be up to the States to establish their own targets, and the proposed rule does not allow that.

While §150 specifies the types of performance measures that must be established, it leaves it up to the States to set their own targets for each of the measures. See §150(d)(1): "... each State shall set performance targets that reflect the measures identified in paragraphs (3), (4), (5), and (6) of subsection (c)." (emphasis added). The proposed rule does not allow States to set their own targets, but rather puts a restriction on the targets by requiring them to represent year-after-year reductions beginning with the very first reporting period. This not only contradicts the statutory language regarding State autonomy over their own performance targets, but also hinders States' abilities to set reasonable, achievable targets.

Comment 3: FHWA should clarify whether the State DOTs' and MPOs' declining targets for reducing tailpipe CO₂ emissions on the NHS must demonstrate 50-52% reduction in on-road CO₂ emissions by 2030 and net-zero on-road emissions by 2050.

The NPRM's proposed rule language requires "declining targets for reducing tailpipe CO_2 emissions on the NHS, that demonstrate reductions toward net-zero targets." Proposed 23 CFR §490.105(e)(10). The most natural interpretation of this language is that the targets must demonstrate declining CO_2 tailpipe emissions, without regard to magnitude, such that net-zero for the NHS could theoretically be reached at some point in the future, without regard to any specific deadline.

However, in the preamble language FHWA describes the rule as requiring the targets to achieve the current Administration's 2030 and 2050 goals:

"This proposed measure would require State DOTs and MPOs to establish declining targets for GHG emissions from such sources to achieve the national goals for 2030 and 2050. The declining targets should be consistent with national, State, and local GHG emission reduction goals for 2030 and 2050." 87 FR 42412 (emphasis added).

"Proposed new § 490.105(e)(10) would require declining targets for reductions in tailpipe CO₂ emissions on the NHS that align with the 2030 and net-zero by 2050 emissions reduction targets..." 87 FR 42413 (emphasis added).

Ms. Stephanie Pollack
Docket No. FHWA-2021-0004

5 October 12, 2022

FHWA must address this contradiction and clarify whether the declining targets required to demonstrate a 50-52% reduction in on-road CO_2 emissions by 2030 and net-zero on-road CO_2 emissions by 2050, or are the targets meant only to aid in the achievement of the current Administration's goals. Even if State DOTs and MPOs are not technically required to meet these goals, if FHWA has an expectation that that they can and will meet these goals, this is problematic for a variety of reasons as explained in the comments below.

Comment 4:

A 50-52% reduction in on-road CO₂ emissions from the NHS by 2030 and net-zero by 2050 is not achievable without a disruptive paradigm shift for the NHS.³ Additionally, FHWA failed to consider that its intent would require actions beyond State DOT and MPO authority. By FHWA not considering the overall practicability of the proposed requirements, the proposed rulemaking is arbitrary and capricious.

FHWA explains that the Federal government has committed to achieving net-zero GHG emissions by 2050, meaning that by 2050, human activities would produce no more GHG emissions than they remove from the atmosphere. The NPRM further explains that the Federal government has established an aggressive national goal of reducing CO₂ emissions 50 to 52 percent below 2005 levels by 2030 in support of the Paris Agreement. TxDOT is not commenting on these national goals. TxDOT's concern, rather, is the proposed requirement that State DOTs and MPOs establish declining targets to achieve such dramatic emissions reductions from the NHS.

While the NPRM offers examples on flexible target setting, the NRPM fails to offer meaningful information on how the national GHG goals may be met specifically for the NHS. The majority of onroad tailpipe emission reductions to-date have been achieved through federal vehicle emissions and fuel controls and associated vehicle and fuel technological advancement as evidenced in FHWA's Transportation Air Quality Selected Facts and Figures webpage. According to FHWA, "A great deal of the credit for the improvements in on-road sources goes to cleaner cars and trucks, and fuels." In addition, EPA and the Intergovernmental Panel on Climate Change (IPCC) reports indicate vehicle and fuel technological advancements will remain critical to achieving future transportation emission reductions. 5.6

OUR VALUES: People • Accountability • Trust • Honesty
OUR MISSION: Connecting You With Texas

 $^{^3}$ Based on the NPRM excerpts cited above in Comment 2, TxDOT assumes that FHWA intends for State DOTs' and MPOs' targets to demonstrate a 50-52% reduction in on-road CO₂ emissions by 2030 and net-zero on-road CO₂ emissions by 2050; however, as explained in Comment 2 above, we are requesting clarification on this point.

⁴ https://www.fhwa.dot.gov/environment/air_quality/publications/fact_book/page12.cfm

⁵ EPA, A Wedge Analysis of the U.S. Transportation Sector, EPA420-F-07-049 October 2007,

https://nepis.epa.gov/Exe/ZyNET.exe/P100230W.TXT?ZyActionD=ZyDocument&Client=EPA&Index=2006+Thru+2010&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C06thru10%5CTxt%5C00000005%5CP100230W.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r15g8/x150y150g16/i425&Display=hpfr&DefSeekPage=xx8SoarchPage=7xyActionS&Pagek=

⁶ IPCC, Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.001, Summary for Policy Makers Headline Statements, Bullet C.8, page 36.

October 12, 2022

FHWA should also consider the results of an EPA report⁷ disclosing that CO₂ emissions can be reduced by 8.83% (0.2%/year on average) from 2011-2050 through a bundle of strategies, some of which are within a State DOT's or MPO's control and others which are not. The bundle includes travel demand management (TDM) + land use changes + transit fare reduction + transit service improvements + parking fees + mileage fees.⁸ For comparison, technological advancements for control of criteria pollutants and air toxics have reduced emissions in the range of 2% per pollutant/average year, but that is largely the result of direct Federal regulation of vehicles and fuels,⁹ which is beyond the authority of State DOTs and MPOs.

6

Furthermore, IPCC states:

- "Meeting climate mitigation goals would require transformative changes in the transport sector"¹⁰ and
- "Combining mitigation with policies to shift development pathways, such as broader sectoral policies, policies that induce lifestyle or behavioral changes, financial regulation, or macroeconomic policies can overcome barriers and open up a broader range of mitigation options."¹¹

The "transformative" policy changes indicated by IPCC would require a combination of federal and state legislative action, private business decisions, individual vehicle purchase decisions, local government land use changes, and lifestyle changes. These simply are not within State DOT and MPO authority. And they are certainly beyond the scope of the performance of the NHS.

FHWA states that the 50-52% reduction in on-road CO_2 emissions by 2030 is from a base year of 2005. For Texas, that would require a 59.3% reduction from 2019 CO_2 emissions, and TxDOT anticipates 2021 vehicle miles travelled (VMT) to be higher than 2019, which would increase the reduction needed.

⁷ EPA, Potential Changes in Emissions Due to Improvements in Travel Efficiency, March 2011, see the summary results table on page 28:

https://nepis.epa.gov/Exe/ZyNET.exe/P100AGMT.TXT?ZyActionD=ZyDocument&Client=EPA&Index=2011+Thru+2015&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5Clndex%20Data%5C11thru15%5CTxt%5C00000002%5CP100AGMT.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL, accessed on 08/01/2022.

⁸ Ibid.

⁹ Review and summary from any number of mobile source pollutant reduction data and histories from FHWA and/or EPA, such as Our Nation's Air at https://gispub.epa.gov/air/trendsreport/2021/#home or other EPA resources at https://www.epa.gov/air-trends.

¹⁰ IPCC, Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.001, Executive Summary of Chapter 10: Transport.

¹¹ IPCC, Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.001, Summary for Policy Makers Headline Statements, Bullet E.2.2, page 49.

October 12, 2022

The 2030 GHG reduction goal would require a massive change for the NHS. For Texas, 1981 was the last time VMT were at the level needed to achieve the 2030 GHG reduction goal, when VMT was only 327,532,277 (all roads, including the NHS and other public roads). It is unrealistic to expect a state to undo 40+ years of VMT growth in less than eight years (by 2030). To accomplish this target, TxDOT would have to ration VMT or find funding and develop for other modes of transportation that may not lie within TxDOT's authority.

7

Below, TxDOT examines two approaches for achieving the 2030 GHG reduction goal, one that would rely completely on VMT reductions and another that would rely completely on electric vehicle adoption. TxDOT does not see any combination of the two that is feasible for achieving a 59.3% VMT (all roads) reduction by 2030.

Approach no. 1: Achieving the 2030 GHG Reduction Goal via VMT reduction

To provide a frame of reference, achieving the 2030 GHG reduction goal via a VMT (all roads) reduction would require the equivalent of five to eight consecutive, compounding COVID-type pandemic lockdowns and associated VMT reductions over the next eight years. This would be nearly equal to Texas 1981 VMT (all roads) that was 327 million when the Texas population was 14.75 million, and gross state product (GSP) was \$247 billion.¹³ Based upon Texas's 2019 VMT (year before the pandemic lock-down), VMT (all roads) was 789 million, population was 28.26 million, and GSP was \$1.79 trillion. As stated previously, to meet the 2030 goal, it would require a 59.3% reduction in VMT from the NHS from 2019, which is unrealistic, and TxDOT is concerned that it could result in cascading adverse effects to society and the economy such as those experienced during the COVID lockdowns (e.g., loss of jobs, loss of business revenue, etc.). TxDOT is further concerned about what the effect would be to Texas if the GSP was reduced from 2019 back down to 1981 GSP consistent with that historic VMT and population (see also the discussion on freight movement below for any combination of VMT reduction and vehicle electrification). Unfortunately, FHWA did not analyze what it would take, what the impacts are and associated costs, along with policies and statutes that would be needed to achieve either the 2030 or 2050 GHG reduction goals. The time limits for commenting on this FHWA proposal prevents TxDOT from being able to conduct a detailed economic and/or societal impact analysis. To reduce VMT by 59.3% would pick winners and losers regarding who can use the NHS, with a disproportionate impact on rural Texas that will be discussed later.

According to the Texas Comptroller, if Texas were a country, the GSP would rank Texas the 9th largest economy in the world,¹⁴ so societal and economic impacts to Texas would likely have ripple effects on both the U.S. and global economy. For comparison, the U.S. real gross domestic product (GDP) (chained to the 2012 US dollar) in 1981 was \$6.94 trillion and in 2019 was \$19.03 trillion. Therefore, in 2019, Texas was almost 1/10th of the U.S. 2019 GDP. Any limitations or rationing of freight movement or other needed business travel on the NHS in Texas have the potential to adversely impact Texas GSP and U.S. GDP and may have impacts on global

OUR VALUES: People • Accountability • Trust • Honesty
OUR MISSION: Connecting You With Texas

¹³ Gross state product (GSP) from the U.S. Department of Commerce, Bureau of Economic Analysis, Regional Economic Analysis Division -- December 2004.

¹⁴ Texas Comptroller, Economy – Fiscal Notes at: https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the <a href="https://comptroller.texas.gov/economy/fiscal-notes/2022/feb/gdp.php, accessed on 08/02/2022. The U.S. Bureau of Economic Analysis (BEA), which publishes the fiscal publishes the fisca

8

October 12, 2022

imports/exports that FHWA should evaluate (see also later discussion on freight movement in Texas).

Per the Highway Performance Monitoring System, the data shows that in Texas and the U.S., VMT tends to grow as population increases. FHWA should document how much reduction would be needed nationwide to equal the 2030 GHG reduction goal and disclose what year of historic VMT that would reflect so FHWA and the public can understand the magnitude of FHWA's proposal.

Approach no. 2: Achieving the 2030 GHG Reduction Goal via EV or other clean vehicle technology

On-road emission reductions can also be achieved by electric vehicles or other non-fossil fuel clean vehicle technology such as hydrogen vehicles, termed hereafter as "EVs" (albeit with the associated demand on the power grid and the environmental impacts associated with EV batteries). However, State DOTs and MPOs do not have the authority to mandate usage of EVs. But even if that were a strategy available to State DOTs and MPOs for meeting the proposed performance measure, it would not be technologically possible to meet the 2030 Goal of 50-52% reductions from the NHS. Using the 2% average annual historic rates of reduction for tailpipe pollutants, it would take Texas approximately 30 years to achieve the 2030 GHG reduction goal. FHWA should evaluate what is achievable nationwide for federal tailpipe emissions and fuel controls between now and 2050. FHWA should also evaluate EV manufacturing projections for the U.S. to assess what is possible.

In the table below, TxDOT provides two base-case and several future EV scenarios to show what it would take to achieve a 59.3% reduction from 2019 VMT (all roads) for the 2030 GHG reduction goal. Scenarios include several potential future miles per gallon (MPG) options. The base-cases are in the first two rows. The information in the table is based on the following information for Texas:

- Number of EVs Registered in Texas: 138,951 (as of July 26, 2022). Projected EVs in Texas by the end of 2022: 170,000. Source Texas DMV.
- 2005 VMT (all roads) = 641,728,448. 50% VMT Reduction = 320,864,224 (2030 target)
- 2019 VMT (all roads) = 789,662,266. 59.3% VMT Reduction from 2019 to meet 2030 target of 320,864,224.
- Approximately 1.5 million new vehicles are purchased in Texas per average year.
 - o The number of new vehicles purchased tends to be less than this average during high inflation, limited vehicle manufacturing, supply chain woes, and/or recession.
 - Currently, there are not 1.5 million EVs available for purchase in Texas per year, and TxDOT cannot predict with accuracy when that many will be available for purchase for drivers on the Texas portion of the NHS. Sales will also depend on vehicle owner purchasing decisions.
- For net-zero, electrification for transit vehicles and long-haul freight vehicles is also needed.
 - Transit authorities are responsible for bus purchases, not State DOTs or MPOs.
 - Long haul freight electrification remains in its development infancy.

The first row represents a business-as-usual or the "current situation" case, with no additional EVs, except what is estimated for the fleet by year end 2022; and the second row is business-as-usual, but with increased internal combustion engine (ICE) MPG. By 2030, TxDOT anticipates it is possible for the Texas fleet ICE MPG to be in the 30s for light duty, and the range of 24.9 to 37 ICE MPG provides a wide range for baseline considerations. TxDOT anticipates the future scenarios of 44-52

41

¹⁵ July 27, 2022 conversation with Texas Automobile Dealers Association representative.

9

October 12, 2022

ICE MPG for light duty is unlikely by 2030. These scenarios are examples to provide a wide range of what it would take for EVs to provide reductions equivalent to 59.3% less VMT to achieve the 2030 GHG reduction goal. For example, Texas would only need 2.3 million EVs by 2030 if light duty ICE MPG was 45, and heavy duty was 7 ICE MPG. However, TxDOT anticipates this light duty ICE MPG is unlikely by 2030. Or, it would take 7.9 million EVs if ICE MPG remains the same as estimated for the base-year business as usual case of 24.9 and 6 ICE MPG for light and heavy duty, respectively. In this second case, it would require 5.3 of the next 8 years to have new car sales in Texas be 100% EV purchases. Based on current global EV manufacturing, that is not realistic. Also, such sales exceed the Administration's goal to have 50% of new car sales be EVs by 2030. 16

CO₂ Emission Reduction Scenarios to meet 2030 target of 50% reduction from 2005 levels (all roads)

			Toddo)		
Scenario (predominant fuel type)	ICE MPG Light Duty	ICE MPG Heavy Duty	Number of Zero Emission Light Duty Vehicles by 2030	Annual CO2 (million metric tons) 2030	Annual CO2 (million metric tons) 2050
Gasoline and Diesel	24.9	6	173,685	178.8	236.0
Gasoline and Diesel	37	6.5	173,685	134.9	178.0
Plug-In Hybrid	52	8.5	173,685	69.1	91.1
Battery Electric Vehicle (BEV)	24.9	6	7,908,437	70.2	0
Plug-In Hybrid/BEV	45	7	2,339,416	65.6	51.3
High MPG/BEV	44	8	4,659,841	69.9	0.9

Prepared by TPP-Data Management August 1, 2022. Estimated diesel consumption is based on avg. fuel efficiency for trucks of 5.8 MPG (2015-2016) / 5.9 MPG (2017) / 6.0 MPG (2018; 2020) / 6.1 MPG (2019). (Source: U.S. Dept. of Energy). Estimated gasoline consumption is based on avg. fuel efficiency for light duty vehicles of 22.0 MPG (2015-2018) / 22.3 MPG (2019) / 22.2 MPG (2020). (Source: U.S. Dept. of Transportation). Estimated C02 emissions for trucks are based upon an estimated 3.862 (2015-2017) / 3.733 (2018) / 3.67919 (2019) / 3.74051 (2020) pounds of C02 emitted per VMT. (Source: U.S. Environmental Protection Agency). Estimated C02 emissions for light duty vehicles are based upon an estimated 0.9061 (2015-2016) / 0.890668 (2017-2018) / 0.87859 (2019) / 0.88254 (2020) pounds of C02 emitted per VMT. (Source: U.S. Environmental Protection Agency). Note: EPA and NHTSA rules require new light duty vehicles to be 49 MPG for model year 2026, but that is different from the overall fleet operating on the Texas transportation system that has multiple year models.

For any combination of EV and VMT reductions for Texas, TxDOT is concerned that:

- It would likely require additional federal and state legislative action and local government action far beyond the scope of State DOTs' and MPOs' management of the NHS.
- A 59.3% VMT reduction in 8 years for Texas could have unintended adverse impacts to society and the economy that FHWA has neither evaluated nor considered.
- It is beyond the authority of State DOTs and MPOs to mandate the needed VMT reductions.
- It would require reductions in on-road freight transport and transition to other modes like rail or new technologies such as drone delivery, which cannot be accomplished on the scale needed to meet the 2030 goal.

¹⁶ Executive Order on Strengthening American Leadership in Clean Cars and Trucks, August 5, 2021. E.O. 14037, 86 FR 43583.

Case 5:23-cv-00304-H

- Annually Texas water freight carriers move 569 million tons of freight worth \$362 billion. That tonnage is 46% Foreign Export, 10% Domestic Outbound, 4% Domestic Inbound, and 13% Domestic Intrastate.¹⁷
- o Annually, Texas air freight carriers move 2.1 million tons of freight and mail worth \$225 billion. That tonnage is 67% Domestic, 19% Import, and 14% Export. 18
- Annually freight rail operators move 325 million tons of freight worth \$405 billion to, from, and within Texas. Another 132 million tons of freight worth \$369 billion is passed through Texas. The breakdown is 43% inbound, 29% pass through, 15% outbound, and 13% within.19
- Annually, trucks carry 1.5 billion tons of freight worth \$1.2 trillion to, from, and within Texas. Another 195 million tons worth \$664 billion passed through Texas. The breakdown is 64% within, 12% inbound, 13% outbound, and 11% pass through.20
- For a state like Texas with a growing population, it is not plausible to remove the equivalent of 59.3% of current highway trips, plus the additional future trips from increased population and increased goods movement through 2030, especially considering the EPA study that indicated TDM type options can reduce approximately 0.2% year (1.6% CO₂ reduction over eight years).

It is also not possible for a State DOT or MPO to achieve the 2030 GHG reduction goal because neither has control over the following measures that will influence future CO2 reductions:

- Current or future tailpipe emissions standards (these are under the control of USEPA and USDOT-NHTSA):
- Population or population changes within a state;
- Current and future generated upstream emissions;
- Current and future land use (in Texas, predominantly under local government jurisdiction);
- Current and future upstream energy consumption and energy sources;
- Current and future economics that impact personal, public, and governmental policy decisions;
- Legislative authorities to ration highway use;
- Legislative authorities on user fees, pricing, and/or tolling; and
- Other societal and/or technological advances that will change where people choose to live, work, recreate, receive goods, and travel.

It is unrealistic to request the equivalent of a 59.3% reduction in VMT by 2030 for Texas. TxDOT foresees no combination of EVs and VMT reduction that could reasonably or feasibly be used to achieve this goal, without a major disruption to transportation and cascading adverse effects to society and the economy. It would also require actions that are beyond the control of State DOTs and MPOs. FHWA did not provide an example of, or a reference for, how to achieve the 2030 GHG reduction goal or net-zero by 2050 for the NHS. Disruptive and/or transformative change for the NHS would require federal and state legislative action, rather than simply FHWA rulemaking. By not

¹⁷ TxDOT, The Economic Role of Freight in Texas. May 2021, accessed on 08202022 at https://www.txdot.gov/government/partnerships/freight-planning/economic-role-freight.html. 18 Ibid.

¹⁹ Ibid.

²⁰ Ibid.

11

October 12, 2022

considering the overall practicability of the proposed requirements, the proposed rulemaking is arbitrary and capricious. Additionally, the NPRM is fostering unrealistic public expectations about what State DOTs and MPOs can realistically achieve by 2030 and 2050. This only adds confusion to the ongoing debate over how best to achieve meaningful reductions in GHG emissions in the United States.

Finally, even if FHWA were to clarify that State DOTs and MPOs are not actually required or expected to achieve the 2030 Goal and net-zero by 2050, the proposed rule's requirement of year-after-year declining CO_2 emission targets would also require substantial changes to how the public uses the NHS, much of which is outside of State DOTs' and MPOs' authority, which the NPRM did not seriously consider.

Comment 5:

It is incumbent upon FHWA to prepare an environmental impact statement (EIS) and regulatory impact analysis (RIA) that takes a hard look at what it would take for the NHS to achieve the 2030 Goal and net-zero by $2050,^{21}$ or even year-after-year reductions in CO_2 emissions from the NHS.

Based upon IPCC statements that "transformative changes" are needed, and since FHWA expects achievement of the 2030 Goal and net-zero by 2050, the NPRM and its associated RIA and National Environmental Policy Act (NEPA) analysis need to fully evaluate the impacts of the action contemplated by the NPRM on the human environment. Clearly, such "transformative changes" cannot be accomplished with an \$11 million-dollar fiscal impact as indicated by the RIA for this NPRM or through a NEPA categorical exclusion (CE).

The RIA does not appropriately evaluate the impacts of the proposed rule if FHWA expects the State DOTs and MPOs targets to help achieve net-zero by 2050.

The NPRM establishes that FHWA's expectation of this performance measure is for the NHS to achieve the 2030 and 2050 Federal policy goals regarding GHG reduction. For example, the NPRM states that proposed new § 490.105(e)(10) "would require declining targets for reductions in tailpipe CO_2 emissions on the NHS that align with the 2030 and net-zero by 2050 emissions reduction targets." 87 FR 42413. FHWA's expectation is further evidenced by the fact that it has set requirements on the performance targets of a continuous reduction in GHG over time, rather than letting the States and MPOs set their own targets. For instance, without being limited in such a way, a State or MPO could set a target of lowering future projected increases in GHG emissions, rather than a reduction from a base year. Therefore, it is not correct to say that States can set their own targets because FHWA has already established that the targets must be a reduction from a base year and be set to meet its 2030 and 2050 GHG emission reduction goals. By including this specific limitation on performance targets, FHWA makes clear its intention not just to evaluate improving performance of the State DOTs and MPOs but to actually achieve the stated 2030 and 2050 emission reduction goals on the NHS.

The analysis, however, only evaluates the impacts of this proposed rule from the perspective of performance reporting, not from the perspective of achievement of the stated goals. The Breakeven

 $^{^{21}}$ Based on the NPRM excerpts cited above in Comment 2, TxDOT assumes that FHWA intends for State DOTs' and MPOs' targets to demonstrate a 50-52% reduction in on-road CO₂ emissions by 2030 and net-zero on-road CO₂ emissions by 2050; however, as explained in Comment 2 above, we are requesting clarification on this point.

12

October 12, 2022

The RIA, for example, indicates that since the cost of reporting the performance measure is only \$11 million over ten years, the GHG reductions needed to break even are approximately 19,614 to 109,322 tons/year for the whole nation; whereas, the RIA indicates in footnote 33 that, "in 2018, the transportation sector accounted for 1.88 billion tons of CO2 emissions..."²². If the RIA evaluated the actual impacts of achieving the GHG emission goals that FHWA sets in the NPRM, the Breakeven Analysis would include costs to achieve the 1.88 billion tons of CO₂ emission reductions necessary to achieve net-zero by 2050, not just the cost of reporting the performance measure. Therefore, since the RIA only accounts for the costs of the annual reporting of the performance measure and not actually achieving the stated goals of the rule, FHWA is clearly indicating in the RIA that the proposed rule's only impact is annual reporting, not State DOT or MPO implementation of costly changes necessary to achieve the 2030 and 2050 GHG current Administration priority goals. Since the RIA directly states it is just evaluating the annual reporting costs and because it is not even in the same ballpark with the costs necessary to achieve the 2030 and 2050 GHG current Administration priority goals on the NHS, it does not represent an accurate accounting of the cost or magnitude of this regulation if FHWA intends to achieve the 2030 and 2050 net-zero goals.

As established above, FHWA states that the proposed rule "would require declining targets for reductions in tailpipe CO_2 emissions on the NHS that align with the 2030 and net-zero by 2050 emissions reduction targets." 87 FR 42413. FHWA will have to choose whether it intends this rule to be nothing more than an annual paperwork exercise or whether the expectation is that State DOTs and MPOs attempt to achieve the 2030 and 2050 goals, because the RIA seems to be saying the former whereas the overall NPRM seems to be saying the latter. If FHWA intends this to be just an annual paperwork exercise, then FHWA should remove all limitations on allowing State DOTs and MPOs to set their own targets because, as stated above, improved performance can be documented without these extreme limitations. On the other hand, if FHWA intends State DOTs and MPOs to take actions to meet the stated 2030 and 2050 goals, then the RIA should be updated to be commensurate with that expectation. That update should include the evaluation of at least:

- The costs associated with a dramatic shift to public transit and/or active transportation, including necessary infrastructure;
- Issues related to increased EV purchases, including supply chain issues and other logistical concerns;
- Possible increases in telecommute options for employees, and other societal, business and personal choice decisions;
- Funding issues beyond what is provided by IIJA;
- Land use changes;
- · Freight movement changes; and
- Differences in vehicle and transport needs for rural and urban areas.

Publications thus far do not indicate 2030 and 2050 goals are practicably achievable, so it is incumbent upon FHWA to provide scenarios and paths forward for what can be practicably achieved and by when it can be achieved. Again, even if FHWA clarified that State DOTs and MPOs are not required or expected to achieve the 2030 and 2050 goals, the proposed rule's requirement of year-after-year

²² Summary Report Economic Assessment: National Performance Management Measures; Assessing Performance of the National Highway System, Greenhouse Gas Emissions Measure RIN 2125-AF99 Proposed Rule, June 2022

13

October 12, 2022

declining CO_2 emissions targets would also require substantial changes to how the public uses the NHS, which the RIA did not consider.

The proposed rule should have been evaluated using an EIS.

Using information from an email FHWA distributed on November 5, 2021, entitled: "INFORMATION: State On-road Carbon Dioxide (CO2) Estimates," the U.S. annual on-road CO_2 emissions were 1604.136 million metric tons (MMT) in 2019. A reduction of 802.07 MMT would be required by 2030 and another 802.07 MMT reduction would be required by 2050 to meet net-zero emission goals.

Assuming the unlikely scenario of no VMT growth over this time-period throughout the U.S., the estimated "rounded" lifetime CO₂ reductions to the year 2100 (reference year used in other NHTSA rule EISs) would exceed 80,206 MMT.²³ This amount is far greater than the reductions from any previous NHTSA rulemaking for which EISs were prepared, suggesting that this rulemaking should also be the subject of an EIS. Below, TxDOT provides a summary of the lifetime reductions listed in EISs of four previous NHTSA rules in the table below.

Estimated GHG Reductions for NHTSA Rules

Vehicle Model Years	Lifetime National GHG Reductions (million metric tons)	Annual GHG Reductions (million metric tons)
2012-2016 (1)	20,700 - 47,300	232-543 (2)
2017-2025 (2)	29,800 -53,300	NA
2014-2018 (3)	6,700-12,500	11-63
2018-2029 (4)	5,000 - 14,200	NA

Sources: (1) NHTSA (2010). Final Environmental Impact Statement, Corporate Average Fuel Economy Standards, Passenger Cars and Light Trucks, Model Years 2012-2016. Washington, D.C.: National Highway Traffic Safety Administration, (NHTSA, 2010, pp. S-5, S-13, 3-85, 3-109).

To summarize, FHWA has an obligation to evaluate the impacts of the proposed rule both in its RIA and pursuant to an EIS. Instead, FHWA avoided these obligations by suggesting, on one hand, that the proposed rule contains just an annual reporting requirement that does not have significant costs (i.e., \$11 million over ten years according to the RIA); while, on the other hand, in the NPRM itself, indicating both directly and indirectly with its limitations on target setting, that FHWA actually expects achievement of the 2030 and 2050 GHG emission reduction goals on the NHS, or at least expects

OUR VALUES: People • Accountability • Trust • Honesty
OUR MISSION: Connecting You With Texas

⁽²⁾ NHTSA. (2012). Final Environmental Impact Statement, Corporate Average Fuel Economy Standards, Passenger Cars and Light Trucks Model Years 2017-2025. Washington, D.C.: National Highway Traffic Safety, (NHTSA, 2012, pp. S-12, S-43, S-47, 2-41) (3) NHTSA (2011). Final EIS, Medium and Heavy Duty Vehicles Fuel Efficiency Improvement Program. Washington, D.C.: National Highway Traffic Safety Administration, (NHTSA, 2011, pp. S-6, S-19, S-20, 3-91, 3-114)

⁽⁴⁾ NHTSA. (2016). Final EIS, Phase 2 Fuel Efficiency Standards for Medium and Heavy Duty Vehicles. Washington, D.C.: National Highway Traffic Safety Administration. (NHTSA, 2016, pp. S-7, S-23, S-24, S-26)

 $^{^{23}}$ This estimate is based upon 1604.136 MMT x 50 years from 2050-2100 for comparison to the NHTSA rule EISs that carried reductions from their rules out to 2100. The amount does not include the annual compounding incremental reductions of 100 MMT needed between 2022-2030 for the 2030 Goal and the 40 MMT annual incremental compounding reductions between 2030-2050 to meet net-zero.

14

October 12, 2022

State DOTs and MPOs to attempt to meet them. If FHWA expects State DOTs and MPOs to attempt to achieve these national priority goals on the NHS, or even achieve year-after-year reductions in tailpipe CO_2 emissions, then this would represent a dramatic paradigm shift as detailed in these comments, and FHWA will have to develop a RIA and EIS that is commensurate with this expectation.

Comment 6: The proposed CO₂ performance measure for the NHS has not been funded by Congress, and therefore would be an unfunded mandate.

With the IIJA, Congress provided \$6.4 billion for the carbon reduction program (CRP), which provides funds for projects designed to reduce transportation emissions. Estimated CRP funding to Texas is \$641,277,338²⁴ for five years. If Congress had intended to provide funding for State DOTs and MPOs to achieve the 2030 and 2050 goals on the NHS, or even year-after-year reductions in CO₂ tailpipe emissions, additional funds would have been necessary.

Transformative changes within eight years would require substantially more funding under multiple IIJA program areas, including the CRP. FHWA cannot simply implement goals via rulemaking when additional congressional action is needed first.

Comment 7: Goods movement within States with national and international ports and distribution centers may be impacted by the proposed application of the CO₂ reduction goals for 2030 and 2050 to the NHS.²⁵

States with major national and/or international ports must respond to the market demand of freight distribution by all modes of transportation, also referred to as goods movement²⁶ herein, for the growing populations of the U.S. and Texas. For example, in its *National Climate Assessment*, the U.S. Global Change Research Program suggests, "Long-haul freight is expected to increase 40% by 2040, while air and marine transportation will continue to grow in tandem with economic growth and international trade."²⁷ If the overarching goal is to reduce CO₂ emissions from the NHS, then FHWA must analyze the impact on the economy as a whole (i.e., job market, consumers, the GDP, etc.). TxDOT has outlined goods movement considerations below:

- Will FHWA expect port states to reduce goods movement through ports and their state?
- Will FHWA expect states to limit new distribution centers and their job opportunities because new distribution centers may increase freight transport and heavy-duty vehicles in the state?
- What happens if the distribution center ultimately reduces transport throughout the nation by providing for shorter trip options while potentially increasing VMT within the state?

²⁴ FHWA, 5-year Carbon Reduction Program by State, https://www.fhwa.dot.gov/bipartisan-infrastructure-law/crp 5year funding by state.cfm, accessed at 10:33 a.m. CdST, 08/01/2022.

 $^{^{25}}$ Based on the NPRM excerpts cited above in Comment 2, TxDOT assumes that FHWA intends for State DOTs' and MPOs' targets to demonstrate a 50-52% reduction in on-road CO₂ emissions by 2030 and net-zero on-road CO₂ emissions by 2050; however, as explained in Comment 2 above, we are requesting clarification on this point

²⁶ EPA, "Ports Primer: 5.1 Goods Movement and Transportation Planning". https://www.epa.gov/community-port-collaboration/ports-primer-51-goods-movement-and-transportation-planning. Accessed 08, August, 2022. ²⁷ USGCRP, National Climate Assessment 2018, Chapter 12 Transportation, page 483.

Ms. Stephanie Pollack

15 Docket No. FHWA-2021-0004 October 12, 2022

If this rule is attempting to achieve the 2030 and 2050 GHG reduction goals on the Comment 8: NHS,28 or even year-after-year reductions in CO2 tailpipe emissions from the NHS, TxDOT disagrees with FHWA that it is a non-significant rule.

The NPRM makes it clear both directly (see Comment 3 above) and indirectly with its limitations on target setting (see Comment 4 above) that the intent of this rule is to achieve the 2030 and 2050 GHG reduction goals on the NHS. However, the NPRM, when referencing the RIA for this rule, indicates that this rule's impact will only be \$11 million over ten years. 87 FR 42404. In addition, the NPRM states the proposed rule is not anticipated to be economically significant and would not have an annual effect on the economy of \$100 million or more. 87 FR 42418. FHWA also determined that the rule would not have an impact on small entities. 87 FR 42418.

Stating implementation of the proposed rule would only cost \$11 million over ten years suggests it is a simple paperwork process, rather than a performance measure with stated goals that would require a disruptive or transformative paradigm shift for society and transportation. It suggests a lack of acknowledgment by FHWA on the disruptive and transformative changes that would be needed for the NHS to achieve the 2030 and 2050 GHG reduction goals or even year-after-year reductions in CO₂ emissions from the NHS – or suggests that these are not the true goals of this proposed rule. Simply stated, it is not possible for the rule to achieve major reductions in on-road GHG emissions and yet for this NPRM to be a non-major rule.

FHWA must disclose which of the two it is—a major or non-major rule—and revise the NPRM and supporting analyses accordingly. FHWA stated, "it is anticipated that the measure will influence transportation decisions and result in significant reductions in GHG emissions." 87 FR 42417. That statement is in direct opposition to this being simply a paperwork exercise as represented by the \$11 million figure. If major reductions are to be achieved, then it is a major rulemaking, and FHWA should prepare an RIA as such with a reasonable figure for State DOTs and MPOs to implement this performance measure.

Comment 9: FHWA does not acknowledge that by requiring all States to meet the same CO₂ reduction goals for the NHS in the proposed performance measure,29 it will have substantially different impacts on some States compared to others.

This proposed GHG performance measure with a single national goal tied to net-zero by 2050, including the interim 2030 reduction target, results in winner and loser States. It would likely cost Texas significantly more to comply than most other States, as evidenced by the following points:

²⁸ Based on the NPRM excerpts cited above in Comment 2, TxDOT assumes that FHWA intends for State DOTs' and MPOs' targets to demonstrate a 50-52% reduction in on-road CO2 emissions by 2030 and net-zero on-road CO₂ emissions by 2050; however, as explained in Comment 2 above, we are requesting clarification on this point.

²⁹ Based on the NPRM excerpts cited above in Comment 2. TxDOT assumes that FHWA intends for State DOTs' and MPOs' targets to demonstrate a 50-52% reduction in on-road CO2 emissions by 2030 and net-zero on-road CO₂ emissions by 2050; however, as explained in Comment 2 above, we are requesting clarification on this point.

16

October 12, 2022

- Texas does not have a fully built out roadway transportation system like smaller and less
 populated States; therefore, it is still in the process of adding lane mile capacity to address
 population growth and congestion.
 - The Texas Trunk System (TTS) is a network of highways outside urban centers connecting cities, sea ports, military installations, and international border points of entry through rural Texas. The objective of the TTS is to create a network of rural divided highways (4-lanes or higher) that complements the Interstate Highway System. Currently, the TTS comprises 10,019 miles. Approximately 52% (5,100 miles) of the system has been upgraded to 4-lanes divided or higher, leaving just under 5,000 miles remaining for improvement.
 - o Texas ranks 35 in lane miles³⁰ per VMT.³¹
 - Texas ranks 33 in lane miles per land area.³²
 - Texas ranks 34 in lane miles per population.³³
- States that have major national and/or international ports, like Texas, will have more VMT from transport activities.
- Out-of-state vehicles using the roadway contribute to overall fuel usage, thereby affecting the State's ability to achieve the goals of the performance measure.
- Some States have more pass-through travelers than others, including Texas, which has four states bordering it and one international border.
- An approach or measure that limits single occupancy vehicles in any way would have a
 disproportionate impact in rural areas based on longer distances, sparse development, and
 less alternative transportation modes, when compared to more urbanized areas.

For purposes of full disclosure, FHWA should reevaluate the proposed rule to consider this aspect of the proposed CO₂ performance measure.

Comment 10: If, despite the issues raised throughout these comments, were FHWA to proceed with a final rule, it would need to establish a due date for the first CO₂ emission targets of at least 180 days after the rule becomes effective.

The proposed rule requires States to include targets for the proposed CO₂ performance measure in their State Biennial Performance Report due to FHWA by October 1, 2022; however, the comment period on the NPRM closes after this date, on October 13, 2022. While the NPRM recognizes that the date for States to report State DOT initial targets for the proposed CO₂ performance measures may need be adjusted, and requests comment on what the due date should be in the event a final rule is not effective by October 1, 2022, TxDOT is concerned that the failure of FHWA to recognize

³⁰ FHWA. Highway Statistics 2020, Chapter 4, Highway Infrastructure, Table HM-48, Federal-Aid Highway Lane – Length – 2020, Lane – Miles by System.

https://www.fhwa.dot.gov/policyinformation/statistics/2020/hm81.cfm

³¹ Bureau of Transportation Statistics. State Highway Travel. < https://www.bts.gov/browse-statistical-products-and-data/state-transportation-statistics/state-highway-travel>

³² U.S. Census Bureau. State Area Measurements and Internal Point Coordinates.

https://www.census.gov/geographies/reference-files/2010/geo/state-area.html

³³ U.S. Census Bureau. Annual Estimates of the Resident Population for the United States, Regions, States, District of Columbia, and Puerto Rico: April 1, 2020 to July 1, 2021.https://www2.census.gov/programs-surveys/popest/tables/2020-2021/state/totals/NST-EST2021-POP.xlsx

17

October 12, 2022

that the deadline for State reporting falls nearly two weeks before the close of the comment period on the proposed rule is indicative of FHWA's intent to finalize the action proposed in the NPRM without fully considering public comments.

Upon close of the comment period for the NPRM on October 13, 2022, FHWA should take some time to adequately consider the public comments and issue any final rule (assuming FHWA does not withdraw the NPRM). If the proposed rule is finalized, State DOTs and MPOs may need time to develop and obtain any required approvals from their governing boards of the CO₂ emissions targets. For example, if changes to state statutes or rules are needed, then additional time would be needed (e.g., the Texas Legislature meets only biennially). After that, State DOTs and MPOs would need additional time to implement any measures needed to attempt to meet the performance measures and obtain the data needed to report progress towards the performance measures to FHWA.

If FHWA does not withdraw the NPRM, it should establish an initial due date for State DOTs and MPOs to include any CO₂ emission reduction targets in its performance measure reporting that is at least 180 days after the date that the final rule takes effect.

<u>Comment 11:</u> If, despite the issues raised throughout these comments, FHWA were to proceed with a final rule, FHWA should not increase the reporting and tracking burden on MPOs by requiring additional reporting for MPOs outside the system performance report.

In the NPRM, FHWA requests comment on whether MPOs should be required to provide the metric calculation method and their tailpipe CO₂ emissions to the State DOT outside of the system performance report to provide for more frequent information sharing. TxDOT recommends against such a requirement, as it would unnecessarily increase the reporting and tracking burden on MPOs and State DOTs.

Comment 12: Additional requirements cannot be added in a final rule without a new NPRM and RIA (and EIS).

Throughout the NPRM, FHWA requests input on various topics, such as:

- "whether the final rule should contain any other provisions to better support" the national policies of 50-52% below 2005 levels by 2030 and net-zero by 2050;
- "potentially introducing a new requirement for State DOTs and MPOs to establish 8and 20-year targets at the beginning of each 4-year performance period"; and
- "what changes to the proposed measure or its implementation in TPM could better the impact of transportation decisions on CO₂ emissions, and enable States to achieve tailpipe CO₂ emissions reductions necessary to achieve national targets."

These and other requests for input suggest that FHWA may be contemplating substantive changes to the requirements placed on State DOTs and MPOs in the final rule as compared to what was proposed in the NPRM. But for that to happen, FHWA would need to issue a new NPRM, RIA, and EIS that evaluates the effects of the proposed changes along with a public comment period because FHWA chose not to issue an EIS or evaluate multiple scenarios as part of the NPRM and RIA that it has published.

Conclusion